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ABSTRACT

Oversight hearings by the U.S. Senate Committee on the Judiciary on Title III of the Higher Education Act of 1965, the strengthening developing institutions program, are presented. Testimony includes results of investigations of implementation of Title III. Problems in program administration and compliance by schools are discussed. Amendments to the Federal criminal code are offered that will require schools to keep adequate financial records and that will hold officials accountable for the federal funds they spend. Ambiguities in what Congress meant by a developing institution and new criteria developed by the Office of Education for Title III eligibility are analyzed. This investigation was begun as part of an ongoing evaluation by the subcommittee on the relationship between the Justice Department and the agencies it serves. (SW)

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TITLE III OF THE HIGHER EDUCATION ACT OF 1965

ED191369

HEARINGS

BEFORE THE

SUBCOMMITTEE ON LIMITATIONS OF CONTRACTED AND DELEGATED AUTHORITY

OF THE

COMMITTEE ON THE JUDICIARY
UNITED STATES SENATE

NINETY-SIXTH CONGRESS

FIRST SESSION

ON

TITLE III OF THE HIGHER EDUCATION ACT OF 1965

NOVEMBER 14 AND DECEMBER 12, 1979

Serial No. 96–38

Printed for the use of the Committee on the Judiciary

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TITLE III OF THE HIGHER EDUCATION ACT OF 1965

WEDNESDAY, NOVEMBER 14, 1979

U.S. Senate,
Subcommittee on Limitations of
Contracted and Delegated Authority,
Committee on the Judiciary,
Washington, D.C.

The subcommittee met, pursuant to notice, at 9:30 a.m., in room 5110, Dirksen Senate Office Building, Senator Max Baucus (chairman of the subcommittee) presiding.

Present: Senators Baucus and Cochran.

OPENING STATEMENT OF SENATOR BAUCUS

Senator Baucus. Today we are holding oversight hearings on title III of the Higher Education Act of 1965, the strengthening developing institutions program.

At the outset, I would like to make it clear that I strongly support Federal aid to small and struggling institutions. There are several small schools in my home State of Montana. I know they have greatly benefited from the program.

In fact, I have here a letter from Bill Huber, the title III coordinator at Carroll College in Montana, in which he outlines the good services of title III at that college. I would like to enter this letter into the record at this point.

[The letter from Mr. Huber to Senator Baucus follows:]

Carroll College,
Helena, Mont., November 9, 1979.

To: Senator Max Baucus.
From: Bill Huber, Montana's Four Colleges title III consortium coordinator.
Subject: Some thoughts on the title III program.

Max, as you know, I serve as the consortium coordinator for four Montana colleges engaged in title III activities. These colleges include Carroll College in Helena, College of Great Falls in Great Falls, Miles Community College, Miles City, and Dawson Community College at Glendive. This consortium consists of two private 4-year institutions and two public 2-year institutions.

First, I would like to express our sincere appreciation for the interest and vital concern which you and members of your staff have demonstrated over the past several years with regard to the status of the title III program in Montana. Your efforts on our behalf and your concern for the program have been most appreciated.

Recently, I have read with interest, the GAO report on the title III program and also an article which appeared in the Washington Star a.m. edition of October 18, 1979, under the byline of Howie Kurtz. Mr. Kurtz states in that article that "over the past fourteen years $940 million dollars in federal monies have been expended on the title III program. Yet not a single developing institu-

tion has graduated from the program." He further states "nor are federal officials able to identify any concrete progress among the eight hundred schools that have received this aid."

Max, I am sure we all realize that there will be problems and some pitfalls developing in any program which has sustained a 14-year life span whether that program be Federal, State, public, or private. I would [illegible] that the $940 million of Federal monies the taxpayer has invested in the title III program for the most part has been money well spent. With reference to an institution not "graduating" from the program. Let me state that I am confident that such is not the case. I am sure that over this period of time there have been institutions which have voluntarily elected not to reapply or who have been eliminated in the selection process; however, this is really not the point when we discuss institutions "graduating" in terms of title III activity. I can attest to the fact that there have been several of the activities that the Montana institutions have engaged in over the years which were planned with title III funds implemented with title III funds, sustained by title III funds for a duration of time, and then terminated as title III activities by the consortium schools and yet these programs continue to be a vital part of the ongoing administrative or educational process at our schools.

In addition the statement that none of the eight hundred schools receiving title III funds can show concrete progress is particularly untrue. As the coordinator for the Montana consortium, I can only testify that without title III funds the four colleges in our State would not be in a position to make the contribution to higher education, in the Montana West, that we are today engaged in. To be specific title III support has accomplished the following to mention only a few:

(1) A nursing planning grant which subsequently resulted in the establishment of a baccalaureate nursing program at Carroll College.

(2) The institutional research component which is shared in by Carroll College, College of Great Falls, Miles Community College and Dawson Community College, has allowed each of these institutions to develop an institutional research capability which they had not previously processed, in fact, I might add that the vice president of one of the community colleges very early in our planning process related "at present our institutional research capability is not much better than a sheep ranch operation." Today that same institution has instituted a most effective capability through the use of a computerized data collection system, computerized registration process and a computerized grading and accounting procedure.

(3) The student services component has developed at two of the four institutions a very effective student learning resources center. At the other two it has provided a much needed improvement in the counseling services. The evidence of our success of these activities is amply demonstrated in the documentation provided to the Onsight Office of Education officer who visited the colleges this past summer.

(4) The native American studies program designed as a consortium activity for the four institutions has been most successful. At the College of Great Falls the Indian education program has graduated, at last count, 27 Indian students who are today employed as teachers or teacher aides at reservation schools or in schools with large Indian population. The Indian education program at the other three institutions has provided an active Indian student recruiting process in addition to developing a high degree of awareness and visibility of the native American programs on campus. It is also providing an excellent counseling and tutorial opportunity for the Indian students.

In addition to these four major areas of activities title III funds have been used to provide numerous opportunities for faculty and administrative development programs through the advanced and summer study grants provided to faculty and administrative personnel. Additionally travel funds have been made available for attendance at administrative and faculty conferences and workshops. The national teaching fellowship program as a part of our title III activities has brought to our colleges the talents and enthusiasm of several young men and women who have greatly contributed to the overall enrichment of our faculties. A number of these instructors continue to make their contributions to the educational programs on our campuses as permanent members of our faculties.

The presidents of the four colleges of the Montana consortium without exception will testify to the fact that the title III funding has been an enormous asset to the overall growth and development of each of our institutions. Additionally, several of the programs we have developed with title III funding could not and would not have been implemented without the encouragement of the title III program in general and without the cooperative effort made possible through the consortion arrangement in particular.

As I earlier stated, we recognize that with any program of this magnitude and duration problems will be experienced. We have experienced frustrations as a result of the procedural and format changes which have taken place over the last 3 years. We continue to be frustrated with the limited qualifications criteria used by the Office of Education. We also find it extremely difficult to plan our program year when we are not notified of funding until late July or August. This makes it very difficult to acquire, at such late date, faculty and staff to fill title III funded positions. Finally, we experience the frustrations of all engaged in Federal program activities; that being, too short notice to properly and adequately plan proposal preparation and then the long wait in being notified of funding results.

Max, I appreciate the opportunity of being able to share with you and your committee some of our feelings relative to the title III program. In conclusion, I would like to suggest the following recommendations:

(1) Provide for regular onsight staff reviews of title III projects. Findings should be included in any subsequent grant evaluation procedure.

(2) Develop an objective grant selection process.

(3) Broaden criteria for eligibility to include:

(a) A broader redefinition of the low income student,

(b) Expand E & G expenditures to include all expenditures, and

(c) Expand BOG expenditures to include all campus-based financial aid programs.

(4) Broaden eligibility criteria in general, such as an update of the statistical factors used in previous years.

(5) Increase funding for title III programs given effective program performance.

(6) Eliminate the requirement for assisting agencies or institutions.

(7) Discourage the practice of large consortium development, i.e., in excess of 10 or 12 institutions.

(8) Encourage the structuring of small consortium in general and small rural consortium developed in particular.

I am pleased to have had the opportunity of sharing these thoughts with you, Max. Please feel free to call on me at any time in the future.

Senator BAUCUS [continuing]. During the past 2½ months, this subcommittee at my direction, has been investigating the implementation of title III. Staff members have reviewed thousands of pages of documents and talked to many individuals at the Office of Education and other agencies. The state of affairs they have uncovered is appalling.

Originally conceived to help struggling colleges help themselves, title III has been manipulated by internal and external forces, to the detriment of those colleges attempting to compete fairly for the limited funds.

I am dismayed at the arbitrary and capricious manner in which title III grants are made—often without regard for schools' needs or for the merits of their proposals. I am equally concerned that once awards are made, the Office of Education does not adequately monitor the schools to insure they are spending the money wisely and on the proper programs.

There is a questionable exchange of personnel between assisting institutions and the Office of Education, which administers title III.

There are possible conflicts of interest involving readers who evaluate program applications.

Peculiarities exist in financial disclosure statements of some Office of Education officials involved in title III.

Rules governing title III are not enforced for certain favored institutions.

There is little or no OE inspection of participating institutions to see if they are accounting for the funds properly.

HEW's audit division has not performed audits in a timely fashion on the title III program.

A potentially unhealthy relationship exists among assisting institutions, applicant colleges and OE.

The total picture our investigation revealed is even worse than that originally revealed by the General Accounting Office in its harshly critical title III report in February of this year. Clearly, the title III program has been much abused.

But such problems are not unique to title III—they exist throughout the Federal Government—and therefore, we are using this investigation as a case study. I will soon be offering amendments to the Federal criminal code that will require schools to keep adequate financial records and will hold officials accountable for the Federal funds they spend.

The subcommittee has begun looking into referrals by Government agencies to the Justice Department for possible prosecution. We will be continuing our investigation of this and other programs in the Office of Education.

Due to the large number of documents that will be presented here today, I would like to move that by unanimous consent all such documents be inserted into the record at appropriate times.

No program is immune from oversight scrutiny. It is my obligation as an oversight subcommittee chairman to look into such situations. Given that as a starting point, these hearings will begin.

Our first witness will be Pat Williams from western Montana.

Congressman Williams, it is an honor to have you here today. I know of your good work in education for many years, as a school teacher, as a member of the Education Committee in the House and as a leader in various education programs in the State of Montana. I highly value your background, your perception and your good basic Butte, Mont., commonsense.

STATEMENT OF REPRESENTATIVE PAT WILLIAMS

Mr. **Williams**. Thank you very much Senator. It is a pleasure to testify before the subcommittee during its oversight hearings on title III, of the Higher Education Act.

The title III program which was designed to assist struggling higher education institutions outside the main stream of academic life is one of our most sizable institutional aid programs. You are to be commended for your attention to the administrative and management problems identified by the GAO and its recent report on the program.

It is important that our efforts to get to the bottom of these difficulties be conducted in such a way that we do not forget the many contributions title III has made to the education resources of this country. We should not lose sight of the importance of title III and the institutional aid programs in general in meeting legitimate educational needs.

We cannot fail to recognize that a major difficulty that GAO discovered in this program was lack of direction and guidance provided by Congress.

As the report points out, there were real ambiguities in what Congress meant by a developing institution. In an effort to more clearly define the program's direction, the Office of Education developed new criteria for title III eligibility, first through regulations proposed in November 1978, and most recently through its proposal for reauthorization of the Higher Education Act.

A number of questions remain about the appropriateness of OE's criteria which define eligible institutions as having a high number of students of low-income families, combined with low-average expenditure per full-time equivalent student. I recently submitted testimony to the Senate Education Subcommittee discussing these issues and I would ask that you include this discussion as part of the record of your hearing.

Senator BAUCUS. Without objection, it will be included.

[The statement referred to above follows:]

PREPARED STATEMENT OF CONGRESSMAN PAT WILLIAMS[1]

TITLE III OF THE HIGHER EDUCATION ACT

Mr. Chairman, I am pleased to submit testimony to the subcommittee on the title III program for developing intitutions. Originated as a way of helping struggling schools outside the academic mainstream, title III is the only Federal program that gives large direct grants to higher education institutions for improving academic programs, administration, student services, and faculty development. In my home State of Montana, the program has been the key in reducing the educational isolation characteristic of rural areas where vast distances block easy interaction among institutions of higher learning.

The House Committee on Education and Labor, and the Senate Committee on Labor and Human Resources learned from a General Accounting Office report issued in February, however, that the title III program is not without its problems. It has been described as vague, mismanaged and lax in following systematic procedures for grant proposal review and awards. This is one of the reasons the administration has attempted to tighten up the program, first through regulations issued in November 1978, and then through legislation presented to Congress as part of the administration's proposal for reauthorization of the Higher Education Amendments.

To be sure, some definition of this program is long overdue, but the arbitrary way the administration chose to do this attempts to change the entire emphasis and direction of this program. Rather than waiting for the Education and Labor Committee to work on title III as part of the Higher Education Act reauthorization, the Office of Education issued regulations in November which based eligibility for the program on a formula which uses only two criteria. Under the formula institutions are scored for high numbers of Basic Educational Opportunity Grants and low average expenditures per full-time equivalent student. The formula, which hinges eligibility for title III to low income characteristics of the student population, was clearly outside the intent of Congress and the Office of Education was persuaded in March to grandfather in title III institutions that had been disqualified from the program. Four months later, the Office of Education presented the committee with a draft proposal for the Higher Education Amendments which included a title III definition which precisely accommodates the formula in the regulations and once again ties eligibility to numbers of low income students and low average FTE expenditures.

There are several problems with this definition which have been identified during the bill's consideration. To begin, there is no consensus that the combination of high BEOG's and low FTE expenditures are the most appropriate measure of a developing institution. Except for a waiver provision approved on the House floor, the formula does not take into account other institutional characteristics such as geographic location which have been referred to repeatedly throughout the legislative history of the program. The waiver, while it will result in awards to deserving institutions that would not otherwise qualify, puts the title III administrators back in the business of making subjective decisions about which institutions get grants. This subjectivity in grant awards was one of the main problems cited in the GAO report. If the criteria were appropriate, a waiver would be unnecessary.

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[1] This statement of Congressman Pat Williams was formerly submitted to the Subcommittee on Education of the Senate Committee on Labor and Human Resources.

Second, for the first time in the history of the title III program, we are defining a struggling institution as an institution with a large number of struggling students. There are a myriad of Federal dollars for struggling students. Ninety-three percent of the authorizations in the Higher Education Amendments passed by the House are already directed toward student aid programs. Under OE's formula we would reduce the amount of money for struggling institutions unless those institutions contain a significant number of struggling students.

Using low income enrollment as an institutional characteristic in determining title III eligibility is not a new idea. Attempts to hinge eligibility to this characteristic have been made in the past but Congress refused to enact such definitions. In fact language specifically providing for the use of low-income enrollment as a factor in qualifying for special assistance under title III was approved by the Senate in 1972, but was deleted in conference.

Finally, Mr. Chairman, by following OE's recommendations, we may be giving a competitive edge to the very schools that have misused this program in the past. In view of the GAO's findings, it is important to determine whether or not that is the case.

Despite these problems with the selection of the new criteria, the Postsecondary Education Subcommittee and the full Education and Labor Committee in the House chose to adopt the administration's proposal perhaps because time was short and no one had come forth with alternative sets of criteria. I submit, Mr. Chairman, that the National Center for Education Statistics collects data on thousands of higher education institutional characteristics, and Congress should not be enacting these provisions by default, for lack of a better idea.

Small colleges are invaluable to our Nation as a whole and to the communities they serve all across the country. While we do not have the same need to educate great numbers of students we have had in the past, we may soon see another increase in those numbers. Additionally, we do have a need for coping with a tremendous amount of new technical information that is changing all the time. Our optimum use of that information is essential to our ability to meet the difficult challenges that face us. Small colleges have enormous potential for meeting this need. I urge the subcommittee to take a close, creative look at the title III program and take decisive, independent action on the program's goals and direction. I look forward to working with you in this effort.

Mr. WILLIAMS. Two of these questions, however, are especially pertinent to your examination today. So, I would like to highlight them for the subcommittee at this time.

The eligibility criteria selected by OE and approved by the House Postsecondary Education Subcommittee, the full Education Labor Committee and the House, this year, for the first time defined struggling institutions as those institutions having significant numbers of low-income students.

The new criteria do not taken into account other institutional characteristics such as an institution's geographic isolation which are repeatedly referred to throughout the legislative history of the program.

For this reason, the subcommittee accepted on the House floor an amendment which would allow such characteristics to be considered.

While this waiver will qualify deserving institutions not otherwise eligible, it also puts the administrators of title III back in the business of making subjective decisions about which institutions are funded under the program. As you know, Mr. Chairman, one of the main difficulties cited by the General Acounting Office report, is the random way in which title III grants have been awarded.

Second, Mr. Chairman, I am convinced that if the new criteria are approved, Congress may be giving a competitive edge to the very projects that have misused this program in the past. We have not determined if this is the case. I would urge the subcommittee to address itself to this question and make recommendations to the Subcommittee on Education based on these findings.

The subcommittee, I know, is mindful of the enormous potential of small, struggling colleges for meeting the many challenges that face us. I look forward to working with you, Senator, to see that this important assistance is put to the best possible use.

Thank you very much.

Senator BAUCUS. Thank you very much, Congressman Williams.

I notice that Senator Cochran is here. Senator, do you have any statement you want to make at this time?

Senator COCHRAN. No, Mr. Chairman. Thank you very much. I appreciate your calling these hearings. We are all very anxious to see that dollars that are available through the Office of Education, are used wisely and in a way that will upgrade our educational opportunities throughout the country. I think the hearing will be helpful to us in trying to do our part to insure that that is a reality.

Senator BAUCUS. I want to thank you, Pat, for coming over. I appreciate your two recommendations. At the end of our hearings we will be submitting recommendations to the appropriate authorizing committee and your committee in the House will be receiving them. I know you will examine them thoroughly and I appreciate your testimony this morning.

Our first witness this morning will be Mr. Fred Will, Director, Grants and Procurement Management Division.

Mr. Will.

[Senator Baucus administered the oath to Mr. Will.]

STATEMENT OF FRED WILL, DIRECTOR, GRANTS AND PROCUREMENT MANAGEMENT DIVISION, U.S. OFFICE OF EDUCATION

Senator BAUCUS. Mr. Will, I want to thank you for coming today and I want to personally thank you for the cooperation you have given my subcommittee staff during the course of this investigation.

Please describe for the subcommittee what your current job is.

Mr. WILL. Yes, sir, Mr. Chairman. I am the Director of the Grants and Procurement Management Division of the U.S. Office of Education.

This position is responsible for some 112 different discretionary contracts and grants programs. We are responsible for the negotiation and award of some 12,000 grants and approximately 1,300 contracts totaling $2 billion a year.

Title III is one of those discretionary grant programs.

Senator BAUCUS. You are in charge of grants and contracts; is that correct?

Mr. **WILL.** Yes, sir, I am.

Senator **BAUCUS.** How long have you been dealing with Government grants and contracts?

Mr. **WILL.** Approximately 12 years.

Senator **BAUCUS.** How long have you been responsible for title III?

Mr. **WILL.** I have been the Acting Director and the Director for the past 2 years. I have been closely involved with title III for the past year, a little better than a year.

Senator **BAUCUS.** What are your responsibilities with respect to title III?

Mr. **WILL.** Our division is responsible for the mailing out of some one-quarter million applications a year. We are the receipt point for all of the discretionary grant applications in OE. That is where our function begins.

When the applications are received, they are turned over to program where they are reviewed by a group of readers. After the readers are finished and the staff in title III finish with them, they develop a slate based on rank-order listing. The slate is in turn sent to my office for negotiation, at which time we are supposed to review the applications and make certain they are in accordance with the various laws or rules and regulations and internal procedures within the Office of Education.

Then, we initiate negotiations with the applicant. We negotiate an amount of money and the terms and conditions based on rules and regulations and then a grant is awarded to the applicants.

Senator **BAUCUS.** Just so that I understand it, when an institution submits an application, outside readers evaluate it and then it is reviewed by title III program staff.

If the decision is made to fund the particular institution, its application goes to the grant section.

Mr. **WILL.** Yes, sir, it does.

Senator **BAUCUS.** The division for which you are responsible. You negotiate with the institution to make sure its application and budget comply with the relevant regulations and rules. Is that correct?

Mr. **WILL.** Yes, sir. That is the way it is supposed to be, yes.

Senator **BAUCUS.** That is a brief summary of how the process works.

Mr. **WILL.** Yes.

Senator **BAUCUS.** Have you read the most recent GAO report?

Mr. **WILL.** Yes, sir. I have, many times.

Senator **BAUCUS.** Could you tell us to what extent you agree with its conclusions?

Mr. **WILL.** I think the GAO report is an excellent report. It is one of the best ones that I have seen in my Government career.

We have also worked with GAO and looked over their working papers. There were a lot of things in their working papers that weren't contained in the report that I think makes the title III situation look even worse than the GAO report indicated.

Senator **BAUCUS.** What are some of the conclusions in the GAO report you agree with?

Mr. **WILL.** The overall lack of accountability on the part of the Federal officials that are responsible for the program, GPMD, which is my division included. The very fact that the program is 14 years old and it took the Office of Education 8 years to develop regulations which are cited in the GAO report, I think gives you some idea of where we stand with the program.

My division, I think for the first time, has been involved to a large degree in trying to clean up the program. It is coming in 14 years after someone is out of the starting blocks to try to bring it up to speed which is going to be a very tough job.

Senator **Baucus**. You suggest that perhaps GAO did not go far enough. What are some of the other problems you know of that weren't contained in the GAO list of conclusions?

Mr. **Will**. They touch on several areas. The internal review procedure, the internal review mechanism, the process if you will. There are so many ways that things can be moved around that I don't think—you have to have a working knowledge of the program and the way it is supposed to work. I don't think that someone coming in and looking at it for a couple of weeks would get that insight into the program.

I think they touched briefly on the relationships of the assisting agencies to the colleges and universities. I think that is an area that certainly should be looked at more closely.

Following up on their recommendations, they did an initial report on title III, I think in either 1975 or 1976, and they made a number of recommendations were implemented, following up on the report that came out in February 1979, following up closely on those, to see what OE had done to improve them.

Senator **Baucus**. The GAO report discussed the fiscal 1977 funding cycle. To your knowledge, have problems outlined in that report been cleared up? If they haven't, please explain.

Mr. **Will**. I don't think—this is my own personal opinion. I don't think they have. My division, myself, we have a number of problems with the new regulations, the regulations that were published in March 1979.

You talk about program managers' discretion. You can look at the files and you know, I am sure, that you have a number of cases where program managers' discretion was taken to the ultimate. I mean, it is just total program discretion.

The regulations which Congressman Williams pointed out definitely have to be tightened up. Here again, this is my opinion, there are just too many loopholes in the regulations and the legislation.

Senator **Baucus**. For example?

Mr. **Will**. OK. The assignment of points. In 45 CFR, sections 16952 and 16953 which cover evaluations, you have x number of points that can be assigned by field readers. We have instances where the field readers' comments were just not taken into account and then discretionary points were assigned by OE staff program people and a grant was recommended for awarding and was in fact awarded based on that.

The points that are available in sections 16952 and 16953 allow the program to do just about anything with the awarding of grants. I have been working closely with the program for almost 1 year and we still have problems on the definition of a developing institution. What constitutes a developing institution? I thing that is something that needs tightening up.

What authorized activities can grantees be funded for? Why do we always find ourselves in administrative battles with our legal people and our program officers because of an interpretation that they have of a very loosely written piece of legislation and even looser program regulations? That makes it almost impossible to administer this program.

Senator BAUCUS. These are the regulations that were finally enacted after how many years?

Mr. WILL. Fourteen years.

Senator BAUCUS. And your suggestion is that these regulations, coming as late as they did, still need to be tightened up?

Mr. WILL. Yes, sir.

Senator BAUCUS. Should the definition of a developing institution be tightened up?

Mr. WILL. Yes, sir, that and the way that points are applied. If you have three so-called outside experts that are reading a proposal and all three of them find that proposal is not worthy of funding, and someone internally at OE can put down points that will make that project fundable, then why bother going to the expense of having field readers review the proposals? This is the kind of thing that is allowed under the evaluation criteria and those regulations.

Senator BAUCUS. Frankly, these are some of the problems we have discovered in our investigation. Let us go over a few of them. How many slates did you receive this year, and for the benefit of everyone here, will you please describe what a slate is?

Mr. WILL. OK. A slate, sir, is a listing, a rank order listing of projects or applications that have been submitted and reviewed and ranked and submitted to the Deputy Commissioner for Program and the Executive Deputy Commissioner for Programs in the Office of Education.

They all review it and sign off and then it is sent forward to our division for negotiations.

Senator BAUCUS. How many slates did you receive this year?

Mr. WILL. We received a total of four, two for the 2-year institutions and two for the 4-year institutions.

Senator BAUCUS. Is it customary to have that many slates for 1 year? Is that a good practice? Is there any problem with that?

Mr. WILL. We have some programs where we only get one slate. We have other programs such as emergency school aid program where we have problems with civil rights clearances where we may get as many as 50 or 60, but that is depending on school districts that are released by the Office of Civil Rights.

Four slates is not all that unusual, no sir.

Senator BAUCUS. Are changes made in a slate?

Mr. WILL. Yes, sir. There were a number of changes made in the slates.

Senator BAUCUS. Who makes those changes?

Mr. WILL. The program officers.

Senator BAUCUS. Who are they?

Mr. WILL. Well, the people responsible for this program. You have Ed Brantley who is the Director of title III. You have Len Spearman who is Associate Commissioner and Al Moye, who is the Deputy Commissioner for Higher and Continuing Education. They all sign off approving the slate.

Senator BAUCUS. What you are saying is that changes are made in the slates that change the amount of funding for each developing institution; is that correct?

Mr. WILL. Yes, sir, plus they might stick in another institution that wasn't on the original slate.

Senator BAUCUS. Or they may delete one?

Mr. WILL. Yes, sir.

Senator BAUCUS. How many changes were made in these slates? Were they fairly similar or were they quite different?

Mr. WILL. There were some eight changes that were made with the 4-year institutions and seven with the 2-year slate.

Senator BAUCUS. For a total of how many changes?

Mr. WILL. Fifteen.

Senator BAUCUS. How many total institutions were listed on the slates?

Mr. WILL. We funded 407 grants this year with this program, sir. We received somewhere around 500 applications from this program.

Senator BAUCUS. What was the ratio for grants per specialist?

Mr. WILL. In our division, I would say a year and a half ago, we averaged some 334 or 335 grants per specialist. At that time, it was about six times more than the Government average of the various agencies we checked with.

About 1 year ago, Mr. Pickman came in as my boss. He gave us some additional slots and we were able to cut that workload almost in half. So, we still have three times the amount of work that most agencies have as far as the administrative management part of it.

Senator BAUCUS. So you are implying that one problem is that your staff is spread too thin. You have inadequate resources and time.

Mr. WILL. Yes, sir.

Senator BAUCUS. With respect to the grants' negotiation that your office conducts you lack staff and time; is that correct?

Mr. WILL. That is right, sir. We received these applications some 3 months after they were supposed to be in GPMD, right up to the last month of the fiscal year.

Senator BAUCUS. What about assistance from the program staff; are they helpful?

Mr. WILL. No, they are not. I will tell you why they are not.

Senator BAUCUS. I was going to ask you that. [Laughter.]

Mr. WILL. OK, sir. The information, the documentation, the justification that is put in these grant files is practically nonexistent. That makes it extremely hard to establish an audit trail, if you will.

If someone were to pick up the files and the applicant asked for $5 million and they were recommended for $250,000, you will find that they have $75,000 for administrative, $50,000 for curriculum development and what have you.

Now as far as I am concerned, if you cut a proposal by 90 percent, it certainly isn't the same proposal that has been reviewed and approved by a so-called panel of experts and in-house staff.

There is no information in the file that would indicate what should be cut out or what positions go or anything. It makes it extremely hard to negotiate these things. When you get 400 of them dumped on you the last month of the fiscal year, and we had six professionals assigned to this program, which is all we could afford to spare at the time, and try to clean up something, we never had a requirement for contract approval, or some of the other administrative procedures that you are supposed to go through and follow, we just didn't have the time.

Senator BAUCUS. Why aren't they more helpful? Have you asked them to help you? Has someone asked the program people to provide you more documentation and appropriate information?

Mr. WILL. We started sending projects back to program. They set up a committee downstairs to provide assistance. We, frankly, ran out of time. We just did not have the time to go through everything that we were supposed to do with these projects.

It wouldn't make any difference if you had 100 program people sitting down there, we just didn't have the time to work with them to get the thing straightened up.

Senator BAUCUS. Do they have the wherewithal to help out?

Mr. WILL. I think as they testified last week before Senator Pell's committee, there is something like 48 programs staff on title III. You work the ratio of 48 program people and staff to the number of grants that they are responsible for, I think there is probably sufficient staff, or pretty close to it, to administer that program.

Senator BAUCUS. Is it 48?

Mr. WILL. That is what was given to Senator Pell's committee, last week, sir.

Senator BAUCUS. I am a little curious about what you said about not receiving fully documented justification from the program staff.

I have here a rule that says, "part III grants, section 2, discretionary grant review program and administration procedures." I take it these are the regulations.

Mr. WILL. These are our internal procedures in the Office of Education.

Senator BAUCUS. Let me read a section to you. It says that "any deviation shall be fully justified in writing and made part of the official file." Apparently, that applies to the amounts that are recommended.

Mr. WILL. That is correct, sir.

Senator BAUCUS. If the internal rules provide that any deviation shall be fully justified in writing and made part of the record, are you suggesting that this internal rule is not being followed?

Mr. WILL. Mr. Chairman, if I could say something, hopefully I am not out of line, but my division has been in existence since 1965. We have very little in the way of written policies and procedures. Our office has never been accepted by the management of the Office of Education. We are looked upon as somebody or a group of somebodies that always stands in the way of things being accomplished.

As far as a check and balance is concerned my division should be that check and balance but it can't be. That document that you are reading from, 3 to 2, is something that we put together and my previous superior would not even sign off on that document designating that as the policy that would be followed in the review of the grant applications and review process.

The administrative management in the Office of Education is just full of holes. There are a lot of areas that should be tightened up. One of those is the acceptance of the role and responsibility of the grants and contracts people in this whole process. That is something that has never been stressed in our agency. It is a battle that the previous directors have gone through and we have gotten absolutely nowhere. That status still remains the same today.

There are a lot of things that we would like to do to clean this thing up. There are a lot of things that we see wrong with this whole process. We are just not given the wherewithal to do it.

We are supposed to review the applications just like the program people do and to make certain that they are in accordance with the law, the legislation, rules and regulations.

If you throw 350 applications at somebody the last month of the fiscal year and say, "Here, we want this thing to be done properly and in accordance with the rules and regulations," it is a physical impossibility. We are supposed to make certain that the grantees or applicants have the wherewithal to perform, whether or not they are responsible people, if the systems are in place, if they have a procurement system or a personnel system or an accounting system.

There is no way we can do that. Two years ago we had less than $15,000 in S. & E. money for travel. We talk about fraud and abuse. I had 33,000 expired grants that went back to 1966 that we are in the process of closing out.

GAO is in. How much money has the Government lost as a result of not doing what they are supposed to do? I can't say that. We are beyond the statute of limitations on a lot of things. We are beyond our limitations in a lot of areas.

We see so many problems in that place. The Office of Education has a lot of interesting programs that do a lot of good things for kids, but when you get into the administrative management of it within the Office of Education, it stinks, quite frankly.

Senator BAUCUS. Well, Mr. Will, I appreciate what you are saying. As I take it, what you are saying is that your office has not been given sufficient wherewithal in terms of staff and funds and basic support.

Mr. WILL. And acceptance.

Senator BAUCUS. And acceptance, to make sure that the title III program is managed properly, or to state it differently, to make sure that money is not being wasted in a very good program.

Mr. WILL. We have abdicated our responsibility.

Senator BAUCUS. So, your division has not had sufficient support, funds and acceptance. Why is that?

Mr. WILL. That is a very good question. I don't know whether I can answer or not. I think, personally, here again, we get into the acceptance business. We are just another evil in the whole process. We stand in somebody's way of doing something that they want to do that may not be in accordance with existing rules and regulations. I don't know.

Senator BAUCUS. Some people within the Office of Education and HEW, concede that the problems you are talking about have existed in the past, and they agree that the conclusions of the GAO report are basically correct.

Mr. WILL. Yes, sir.

Senator BAUCUS. But they go on to say that everything has been taken care of, that everything is fine and we shouldn't worry. Those abuses in the past have been corrected.

Do you agree with that? Is everything tightened up?

Mr. WILL. Well, we are trying to tighten some things up. It certainly isn't as finely tuned as a lot of people would have you believe. We are trying.

Senator BAUCUS. Are you now getting the full support and acceptance you feel you need?

Mr. WILL. No; we are not. We are still fighting with program staff over our roles and responsibilities, questioning their authority and integrity, which is something we have to live with on a day-to-day basis. But it is a constant struggle.

We have performed seven site visits with program and some student financial aid people on institutions that have been identified as the ones that are in the most trouble.

Here again, we are limited by staff constraints and money, to go out and provide the necessary assistance. The problem that I see with the whole title III program as far as audits and everything are concerned, where was the Office of Education 14 years ago when we started funding some of these institutions.

We go out some 10 or 12 years after they have received their first grant and then we start telling them everything that is wrong. Why didn't we provide assistance at the front end of that grant? Why didn't we check to see if they had an adequate financial management system, if they had a good administrative thing, if they had good policies and procedures. This is something when I say that OE has abdicated its responsibilities, this is something that I see should be taken care of at the very front end and not wait until the auditors go in and find all kinds of things that are wrong and then the Office of Education taking on its cloak of being the good guys, so to speak, and telling them, "You know, you have done this improperly, and you don't have this, that, and the other thing."

I just see that as the wrong tack to take.

Senator BAUCUS. You say you still don't have 100-percent acceptance from the program people. Is there a certain level within the program office at which there is a problem?

I am trying to get a feel for where the problem is.

Mr. WILL. We have a Division Director that is dealing with a Deputy Commissioner. Right off the bat I am two or three steps down and I am in trouble already.

I am in an agency, as I said before, that really has not stressed the administrative management. This is a problem. It will continue to be a problem until somewhere along the line management stresses the need for program management and administrative management to work together for common goals and that is improve management and improve programs.

Senator BAUCUS. You are suggesting your office be given a higher status.

Mr. WILL. I would say, yes.

Senator BAUCUS. So you can deal on a par with other programs.

Mr. WILL. Yes.

Senator BAUCUS. Let us talk about specific changes, for a moment, in the funding slate. When you receive notification of changes, who at OE did you most often deal with?

Mr. WILL. Changes in the slate or just changes period?

Senator BAUCUS. Either way.

Mr. WILL. They would go through the Executive Deputy Commissioner for Program, that is John Ellis. We would deal with his office. We would also deal with the program and my immediate superior, Mr. Pickman, on the changes.

The latest changes, the slate list that came up to us in August, did not go through Mr. Pickman's office. They came directly from John Ellis and program to us.

Senator BAUCUS. How did they usually communicate with you. Were there meetings or phone calls?

Mr. WILL. Memoranda and phone calls, yes, sir, and meetings.

Senator BAUCUS. Are you familiar with the recent extension of Morris Brown College's title III grant?

Mr. WILL. Yes, sir, I am.

Senator BAUCUS. It is my understanding that its grant had expired before the grant was extended. I wonder if you could explain the circumstances surrounding this extension and who forced the issue?

Mr. WILL. Initially our office turned it down.

Senator BAUCUS. You mean the extension?

Mr. WILL. The extension, for a number of administrative reasons, and then we thought it was a dead issue. And then I received a phone call and then a memorandum after the phone call.

Senator BAUCUS. From whom?

Mr. WILL. Mr. Pickman. I was directed to extend that grant.

Senator BAUCUS. What were his reasons? Did he just tell you to do it?

Mr. WILL. I was told to do it, yes, sir.

Senator BAUCUS. Was that extension against Government regulations?

Mr. WILL. Once a grant or a contract has expired, the project period is over, we have been told that it is improper to resurrect it, so to speak.

Senator BAUCUS. What about Durham College in North Carolina? It is my understanding that Durham lost its accreditation but received funding anyway. Could you tell us what the circumstances were surrounding this grant and who approved it.

Mr. WILL. Durham College, near the end of the fiscal year, we were told that they had lost their accreditation. Then we were told they had lost two of their three accreditations, and that we should go ahead and proceed with making an award, but put a condition on that award that they could not spend money until it was determined that they were in fact accredited. That is what we did. We were directed to make that award, also.

Senator BAUCUS. As I understand it, under the regulations, awards cannot be made to institutions that are not accredited. Is that correct?

Mr. WILL. That is correct, yes, sir. That is the program regulations.

Senator BAUCUS. You are telling me you were directed to make an award pending accreditation. Is that correct?

Mr. WILL. Well, according to what I was told, they had lost—they had three accrediting groups. Two of them had revoked their accreditation. They still had one. They were appealing the other two and we should make the award pending the outcome of that appeal and the determination as to whether or not they were still eligible. If they were determined not to be eligible, then we would have to terminate the grant.

Senator Baucus. Is that standard procedure?

Mr. Will. What, sir?

Senator Baucus. Is that any way to run a railroad?

Mr. Will. I would say it is not a good way to run a railroad. It is what we refer to in our business as banking money.

Senator Baucus. Earlier I asked you several questions about the regulations. You testified they were a little loose and vague.

Mr. Will. Yes, sir.

Senator Baucus. Would you say that the OE program staff has too much discretion under current regulations? Is that a valid conclusion or not?

Mr. Will. I think so.

Senator Baucus. Could you give an example of why there is too much discretion?

Mr. Will. Well, I can cite several. I know of one in particular where the readers, the outside readers stated that the proposal or the application should not be funded. They recommended it not be funded and they gave it extremely low scores.

Senator Baucus. Which school is that?

Mr. Will. Well, Catholic University of Puerto Rico is one. There was another one; Northeast Mississippi Junior College is another one that comes to mind. There are several of them. We could go through the files and submit for the record, if that is something you would want us to do.

Senator Baucus. If you would please.

[The material referred to can be found in the subcommittee's files.]

Mr. Will. Yes, sir.

The program staff assigned their appropriate points and lo and behold, it received enough points so that it was above the 100-point cutoff established by program. We ended up funding that proposal.

Senator Baucus. There is no requirement that the reasons for giving Commissioner's points be documented or fully explained?

Mr. Will. They are supposed to be, yes, sir.

Senator Baucus. But they were not?

Mr. Will. No, sir.

Senator Baucus. Should schools that are high on the funding slate receive a large percentage of their requested funds?

Mr. Will. That again is what is supposed to happen, yes, sir.

Senator Baucus. That is, regulations indicate that is supposed to happen; is that correct? Is that internal policy or what?

Mr. Will. No, that is an internal policy, yes.

Senator Baucus. Do schools high on the funding slate receive a large amount of their requested funds?

Mr. Will. In some programs yes and others, no. I would say that this is not the case in title III.

Senator Baucus. That is a discrepency in title III?

Mr. Will. Well, here again, you have the program officer's discretion to determine how much money a grantee receives.

Senator **Baucus**. Are you suggesting again that the regulations are too loose, there is too much discretion?

Mr. **Will**. Yes, sir.

Senator **Baucus**. Or is it that the rules and regulations are there. They are just not being followed?

Mr. **Will**. Yes.

Senator **Baucus**. A combination of both?

Mr. **Will**. Yes.

Senator **Baucus**. To what degree is it on each?

Mr. **Will**. They pretty much follow the regulations, but the discretion business I think is by far the one that is abused the most.

Senator **Baucus**. Who set the funding cutoff at 100 points?

Mr. **Will**. The program officer.

Senator **Baucus**. What were the reasons given for that?

Mr. **Will**. I don't know, sir. By the time we got the applications our concern was getting them funded and not getting in trouble with Congress for turning back $120 million.

Senator **Baucus**. What about the audits that you requested? How many did you request of schools that you thought were mishandling funds?

Mr. **Will**. OK. We started, I guess, in March 1979. We met several times with the audit agency. We were very much involved with the GAO report and trying to put some things in place to clean up the program. We met with the audit agency. We were trying to determine how to proceed with this whole audit business. The problem that kept coming up, the Office of Education could not get a handle on the amount of money or the number of subcontracts or cooperative arrangements with assisting agencies.

We thought that a necessary step should be to audit those assisting agencies and we could make some determination as to if there was widespread abuse in the use of assisting agencies and if a determination could be made as to which colleges were part of this overall abuse and then we would lock in on those colleges.

When you are talking about 600 or 800 different grantees and trying to pick up here again on what are the worst and locking in on them was extremely hard at the time.

Now we have in fact performed several site visits as I said before with program and we have made some recommendations that some of the title III colleges be audited right away.

Senator **Baucus**. Are you able to audit those schools?

Mr. **Will**. What we do is once we come back from the site visit we put together a report. That report works its way up through the daisy chain and, if an institution, if we feel it is in serious trouble and has problems with accounting for Federal funds, we recommend that they be audited right away.

It is based on that recommendation that hopefully the audit agency will go out and audit those colleges.

Senator **Baucus**. Do they go out and audit?

Mr. **Will**. We have had a few that have been audited; not very many. We could count them on one hand.

Senator **Baucus**. Why so few?

Mr. **Will**. I don't know why so few. It is just within the past year, as I said, that we have really locked in on this program. We made requests to the audit agency in April. We have made subsequent requests on other occasions that they get in and do these assisting agencies and that they give special priority to the title III program.

Senator BAUCUS. Who is supposed to do those audits?

Mr. WILL. The HEW audit agency. That is their responsibility and, or the IG, the Inspector General.

Senator BAUCUS. Yet there are only a few audits as you say.

Mr. WILL. That is right, sir.

Senator BAUCUS. How many site reviews have your employees conducted in the past couple of years?

Mr. WILL. All I can address is the last couple of months. We have done seven to date. We have about 12 more scheduled for the next month or two. It is a total of 19.

Senator BAUCUS. A total of 19 site reviews over what period of time?

Mr. WILL. October 1 through December.

Senator BAUCUS. That is this October 1?

Mr. WILL. Yes, sir, this October 1 to this December.

Senator BAUCUS. Is that a sufficient number of site reviews?

Mr. WILL. No. I can't answer for the program because we have not been privy to information that they have obtained through site visits. Some of the information we have come up with, we have some title III grantees that in fact have good systems in place—Xavier is one that comes to mind. There are other site visits, Knoxville College, for example where we found a lot of things we feel are wrong.

We have recently received a copy of an audit that was performed by the HEW audit agency on Shaw University. There are a lot of problems with that institution from the audit report.

Senator BAUCUS. Are you saying there have been an insufficient number of site reviews and audits and that is the reason, in your judgment, why a lot of money has been wasted?

Mr. WILL. Yes, sir.

Senator BAUCUS. On the program.

Mr. WILL. Yes, sir.

Senator BAUCUS. Could you describe for me what an assisting agency is and how it is related to this question?

Mr. WILL. OK. I will attempt to. The assisting agencies, as far as we can determine, came about in 1971. They were more or less set up and created by the Office of Education. You know, this would be a good idea to do thus and so and to set something up to provide assistance to these developing institutions.

As a result of that, it has been built into the regulations, legislation, that there will be assisting agencies providing help to these developing——

Senator BAUCUS. Assisting agencies are private entities; is that correct?

Mr. WILL. Yes, sir, they are. They—we have been able to document—go so far as to even write proposals for applicants, they solicit institutions to participate in the title III program.

We have documentation to the effect that this is a typical canned such and such proposal. As far as we can tell, they exercise a large degree of control over the title III program. We have not been able to determine the exact amount of money that is funneled into these assisting agencies. We have gone through various and sundry reports for fiscal year 1977 and 1978.

Here again, we didn't force the issue until this year and really fight over getting subcontractual agreements between the grantee and the assisting agencies.

In the GAO reports, there were a number of instances where there was not a writing for large amounts of money, where the grantee just literally turned over in monthly installments thousands of dollars to an assisting agency to provide some service which GAO is not able to determine, you know, that they had in fact provided.

We have this year insisted that they do enter into a written agreement. We are still in the process of getting all those agreements from the various and sundry grantees.

Senator BAUCUS. So you are saying the assisting agencies allegedly help grantees with their proposals and other programs.

Mr. WILL. Yes, sir.

Senator BAUCUS. I take it that most assisting agencies are located in Washington, D.C.

Mr. WILL. Yes.

Senator BAUCUS. You are saying there is no way for your office or for the American taxpayers to know which dollars that go to institutions go to the assisting agencies. There are not enough receipts and documentation to find out where the money is going and the degree to which money is going to assisting agencies and not institutions: is that right?

Mr. WILL. That is right, sir. Our regulations state that the grantee must exercise administrative control over the funds.

One of the problems that we run into is an award. A hypothetical case. An award is made for say $500,000, to a grantee, a college or so-called developing institution. Some $490,000 of that may be in what they call a cooperative agreement which is funneled through to an assisting agency.

In a lot of instances, there was no paper, no paper existed, no contractual documents existed between the assisting agency and the grantee.

Here we are holding the grantees responsible and accountable for that money and a lot of instances going back a number of years and saying, "OK. What did you do with that money?" What did the assisting agency do with that money? This is why we felt that the assisting agencies should be audited first to find out how much money went in there and from what institutions and then from there the audit agency could move out to all of the grantees that are working with these assisting agencies.

Senator BAUCUS. So that I fully understand, are you able to audit these agencies to the degree you think is necessary or appropriate?

Mr. WILL. The assisting agencies?

Senator BAUCUS. Yes.

Mr. WILL. This is what we are hoping that the HEW audit agency will do for us. This is what we have been pushing them to do since April 1979, sir.

Senator BAUCUS. Have they ever done it?

Mr. WILL. We don't know where they stand with the audit, sir. All we know is they have done some preliminary work.

Senator BAUCUS. Have assisting agencies ever been audited fully in the past?

Mr. WILL. I know of only one that might have been in all the years they have been in existence.

Senator BAUCUS. You are saying the answer is no.

Mr. WILL. That is right. They have not, sir.

Senator BAUCUS. I take it, too, there are potential problems with people who are part of assisting agencies who have immediately been employed by the Office of Education. Will you go into that particular problem. Is there a revolving door and a potential conflict of interest here?

Mr. WILL. We, I think, see it that way. I sometimes think we are in the minority. We have seen a number of instances where people have come from assisting agencies into the Office of Education. The GAO cites an instance where the Director of the strengthening developing institutions program is now listed on the board of directors of an assisting agency.

So the answer to that is, yes.

Senator BAUCUS. Who is that, please.

Mr. WILL. Dr. Willa Player.

Senator BAUCUS. I am sorry for interrupting. Go ahead.

Mr. WILL. We see there are several people that are currently on program staff that have worked in the recent past for an assisting agency.

Senator BAUCUS. What are the names of some of those people?

Mr. WILL. Dr. Ed Brantley, for one, who is the Director of the title III program, was a former president of Knoxville College, which is a title III grantee.

He was also a member of TACTICS.

Senator BAUCUS. TACTICS?

Mr. WILL. That is one of the assisting agencies, yes, sir. We currently have a Dr. Robert Albright who works on Al Moye's staff who a few months ago was associated with the Robert Moton Institute which is also an assisting agency.

Senator BAUCUS. I want to thank you, Mr. Will. I have one final question. From what you have said this morning, I can tell you have thought a lot about this.

Mr. WILL. I am still nervous.

Senator BAUCUS. You are doing very well. In your own words, what suggestions do you have to prevent these kinds of abuses from occurring in the future?

You know, it is one thing to expose them and another to prevent them from happening in the future. That is the point of this hearing: to not only uncover the problems but to find constructive ways to prevent them from occurring in the future.

So, in your own words tell me a few things that would be helpful here.

Mr. WILL. Well, first of all, I think the legislation needs to be clear. I think Congress has to dictate, mandate, do something to tighten up the whole title III program.

The current regulations I think should just be thrown away and we should start over and tighten those up. And then fine tune them as we go along—the whole administrative review process, the evaluation, the review, being able to provide technical assistance to applicants and helping them along the way.

We find ourselves always in a crisis, firefighting situation where we, at the end, the last month or the last couple weeks of the fiscal year, where we are really running like mad to get grants awarded.

As you know, when you were hiring staff and trying to get something lined up or a project lined up, it takes a lot of time to get the right people to do the job. If you notify a grantee 2 weeks before you expect him to hit the ground, or her to hit the ground running, so to speak, on day one, you are supposed to be operational. You have no staff. You have nothing to work with.

Here again, acceptance of roles and responsibilities, who does what and when in the process? It is just something that doesn't happen. The lack of accountability and responsibility—if you charge somebody with several billions of dollars in taxpayers' moneys, and then there is no accountability built into it, what happens? What happens if I don't meet my goals and my objectives that we have established? What happens? Something should happen. We don't have that accountability with this program and a number of programs. Who is responsible for it?

When you get to the point where who is in charge of this program? Why didn't you do certain things? Then there are a number of things that I think Congress should be asking our agency as far as this whole program is concerned. Accountability and responsibility, I can't stress enough, sir.

Senator BAUCUS. What about increased site reviews? They would be helpful and regulations that would tend to prevent potential conflicts of interest would be helpful.

Mr. WILL. Yes, sir.

Senator BAUCUS. Maybe even dealing with this revolving door problem is something.

Mr. WILL. This all gets into the time line, Mr. Chairman, of things coming in at the last minute. There is no way that you can run a clean process if everything is geared to the last couple of weeks of a fiscal year. That has to be tightened up. There has to be more involvement of the so-called check and balance group in this process. That has not happened that much in the past.

Senator BAUCUS. Thank you very much, Mr. Will.

Senator Cochran.

Senator COCHRAN. Thank you Mr. Chairman.

Mr. Will, I was curious when you described the fact that some members of your office or the office that decides where this grant money is going to go, have actually had experience working out in the field with the program. Is that necessarily bad in your opinion?

Mr. WILL. I don't think it is if people can be objective about it.

Senator COCHRAN. I ask you this, then, are there any personnel to your knowledge, who are now in a position within the Office of Education deciding where grant money is going who are deriving any income or are affiliated in any official capacity with any of the grantees, or consulting assisting agencies?

Mr. **Will**. Not that we know of sir, but we have asked that an investigation be done on some of the conflict-of-interest cases that we have identified. We don't know where that will lead. There is that possibility. I couldn't say for certain right now that that is happening with these people.

Senator **Cochran**. Do you have any information that leads you to believe that that is true?

Mr. **Will**. No, sir, I don't.

Senator **Cochran**. To whom have you directed your request for an investigation of the possibility of that arrangement?

Mr. **Will**. I have referred it to my superiors as far as the conflict-of-interest cases are concerned. They, in turn, have turned it over to the lawyers in the Department, in the Office of the Secretary.

Senator **Cochran**. Who are your superiors?

Mr. **Will**. Mr. Pickman.

Senator **Cochran**. Have you likewise made suggestions for any new regulations to be issued that would correct some of the deficiencies that you have identified?

Mr. **Will**. Yes, sir. We have been battling for the better part of a year to improve on these regulations. We were told that the previous Commissioner of Education himself had made the changes which would allow all of the program discretion that is contained in these current regulations.

A program manager having some discretion is one thing, but when they have total discretion to make decisions, funding decisions, to the detriment of the program and giving people a fair shake, I think we have overstepped our responsibilities.

We have been battling, as I said, for the better part of a year on these regulations. We were overruled.

Senator **Cochran**. Prior to the hearings I happened to have received a telegram from one of our respected educators in the State of Mississippi, Dr. John Peoples who is president of Jackson State University.

Among other things, he commends consulting agencies including ISE, TACTICS and the Moton Foundation and says that these agencies have played a vital and useful role in providing technical services to the developing colleges.

Dr. Peoples is a very well respected educator throughout the country and is president of one of our finer institutions of higher learning in the State of Mississippi.

For the purpose of having that information, I would like to ask this be made a part of the record at this time, Mr. Chairman.

Senator **Baucus**. It will be inserted at this point.

[The telegram of Dr. Peoples follows:]

[Telegram]

Jackson State University,
November 8, 1979.

Hon. Thad Cochran,
U.S. Senate,
Washington, D.C.

This is to request your support for the title III, developing colleges program, on which there is to be a hearing on November 14, 1979. I understand that the hearing will be held in the Subcommittee on Judiciary, on which you sit.

There may be concern about the roles of consulting agencies such as ISE, and Tactics, and the Moton Foundation. I can say that these agencies have played a vital and useful role in providing technical services to the developing colleges.

JOHN A. PEOPLES, Jr., *President.*

Senator COCHRAN. One of the recommendations that you made was that Congress tighten up the language in the authorizing legislation, more clearly identifying the purpose of the title III program, and giving the Office of Education a little clearer guidance in how the program is to be administered.

It has come to my attention that the House Education and Labor Committee has reported out a bill containing amendments to the title III authorizing legislation.

Reviewing it, it seems to me that there may be the answer to the problem contained in this bill. Have you had an opportunity to review the amendments to the title III program contained in this House of Representatives bill?

Mr. WILL. No, sir. I am familiar with the House versions, but I have not seen the latest.

Senator COCHRAN. Well, this appears to be a consensus bill that has come out of the House Education and Labor Committee. It has the sponsorship of not only the chairman, Mr. Ford, of Michigan, but about 14 other members of that committee.

Among the things that are done or purported to be done by the bill is a definition of the purpose of Title III, and requirements that the recipient institution must provide a great deal more information as a matter of law with its applications, that it has to follow up after it receives a grant and communicate to the Office of Education how that money was spent.

It seems to me from reviewing this language that this may very well go a long way toward curing in the future some of the deficiencies in the program which you have identified.

Do you agree with that?

Mr. WILL. I would certainly like to see that.

Senator COCHRAN. Well, as involved as you have been with this entire matter, I would have just assumed you would have been looking to see whether there was any activity in Congress that you were saying was needed, was being done.

Mr. WILL. I was at the hearings last Friday of Senator Pell's committee. Some of the things that they were talking about—I have been trying to keep up to speed with all of the revisions and so forth.

Senator COCHRAN. Was your office asked for any comment with respect to the legislation that is pending in Congress?

Mr. WILL. No, sir, because we have been directed by our secretary not to deal with people on the Hill as far as pending legislation is concerned.

Senator COCHRAN. Well, that office is called on from time to time, I presume, to respond to amendments or legislation that may be pending in the appropriate committees. Is that handled directly out of the Secretary's office?

Mr. WILL. We have an Office of Legislation, but as a matter of course, we get back into the acceptance of our role and responsibility in this process. I would venture a guess that the people in our legislative office wouldn't even entertain the idea of this. Maybe they should go over to grants and procurement and have them review it and see what impact it has as far as the grant-making process is concerned or the administrative process.

Senator COCHRAN. Were you or was Mr. Pickman asked to testify at any hearings at the House Education and Labor Committee on this subject matter that is contained in this bill?

Mr. WILL. I know I wasn't, sir. I don't know if Mr. Pickman was or not.

Senator COCHRAN. As a practical matter could we reasonably expect a grantee institution to monitor or audit or assume responsibility on how an assisting agency or a consulting firm uses the funds that are allocated to it by that grantee institution?

Mr. WILL. It is part of their responsibility in accepting the grant, sir. But I can't say if in fact that is that crystal clear to the grantees. I think that is one of the problems that they are having with the auditors.

A case in point is North Carolina Central had a $90,000 audit exception of which $85,000 of that audit exception was identified with an assisting agency.

The college, quite frankly, didn't know what to do. We got this, my God, how can we pay back $90,000. The assisting agency did in fact pay back the $85,000, but, here again, this is all part of the problems we have had historically with this program and our involvement with the administrative process.

Senator COCHRAN. Which school?

Mr. WILL. North Carolina A. & T. I am sorry, not North Carolina Central.

Senator COCHRAN. As a practical matter, how would you recommend that that responsibility be exercised by the grantee institution? Hiring a staff of auditors to conduct audits of the assisting agency or consulting firm?

Mr. WILL. Where is the Federal influence on this? Those decisions should have been made prior to the grant being awarded. Those types of assistance should have been provided to that grantee prior to their getting the award. This is the problem.

What is expected——

Senator COCHRAN. You are suggesting that you send the staff of auditors along with the grant for them to use?

Mr. WILL. There are just too many of them. We have some we have been able to identify through the student financial aid program that are having a lot of problems with student financial aid. I think those are the ones we should lock in on first and provide that kind of assistance to them, the ones that are in the most trouble from the fiscal and administrative management standpoint.

Yes, I think the Federal Government should. The Office of Education should play a more active role in that whole process. I think that is one of the problems that grantees have. Someone else has had to come in and pick that up in the way of an assisting agency.

They, in the past, have gone out on site monitoring trips and everything else. Where is the Office of Education? Why do we have to get a contractor to monitor our programs? They are our programs. We should be responsible for them, without an assisting agency.

Senator COCHRAN. Or a grantee institution.

Mr. WILL. Or a grantee institution.

Senator COCHRAN. That is the reason I asked the question to begin with. Are you trying to transfer to the grantee institutions responsibility that really may belong in the Office of Education for auditing and making sure the grant funds are used for the purposes intended by both the grantee institution and the Office of Education?

Mr. WILL. Well, I think we owe a lot to the taxpayers of this country as far as determining if the grantee is in fact responsible and is accountable as far as receiving Federal moneys. If the answer is that they are not a responsible person or they are not able to account for those funds, then why are we giving them to them in the first place.

If they don't have the capability to perform and to handle all the administrative burden that is placed on them by accepting Federal money, then why are we giving it to them?

Senator COCHRAN. If you use the Ohio States and universities of Michigan as a standard they will be the only ones who can handle the money. But Utica Junior College in Mississippi and some of the colleges in Montana or other States which don't have the staff and full-time auditors and their own GAO won't ever be able to qualify for the funding.

My experience has been, frankly, in just my short time here in Washington, that the two things the Federal Government does the best is collect money and write checks. When you get into the business, as you suggest you ought to be doing, providing technical assistance to the grantee institutions, giving them staff or auditors and trying to administer the program at the institution level, then I think we may be wasting a lot of money. A lot of money is going to be falling through the cracks instead of going to students, or going to upgrade faculty.

I don't think as a result of this experience we are having we ought to throw away title III.

Mr. WILL. I would agree with you.

Senator COCHRAN. I think we can improve it. I think the legislation that is here on the Hill now that is under consideration will go a long way toward helping cure some of those abuses. The fact that this has been identified as a problem is a constructive thing.

I hope we don't get carried away like you suggest and start insisting on grantee institutions having responsibilities which they really might not be able to discharge. That may make ineligible a lot of institutions we are trying to help in legislation of this kind.

I think it is a noble purpose and we ought to do everything we can to make it work, make it work in a way that reduces waste and fraud and inefficient use of taxpayers' money. I think we all agree with that. That is what this is all about. I appreciate your being here and helping us in this regard.

Mr. WILL. Thank your Senator.

Senator COCHRAN. Thank you Mr. Chairman.

Senator BAUCUS. Thank you Senator. Mr. Will, I want to thank you again, very much, for your candor and your frankness in coming here today and giving us the benefit of your experience and recommendations. You performed a very admirable service. I think everyone in this room is impressed with your integrity and your desire to help make a good program work.

All of us agree that title III is an appropriate program. It is a matter of making sure it works better and doesn't waste money. I think all America can be proud of the service that you are performing in trying to make this Government work a little bit better than it has been in the past.

I want to thank you very much personally for your appearance here today.

Mr. WILL. Thank you, sir.

Senator BAUCUS. Our next witness will be Dr. Edward J. Brantley, Director, Division of Institutional Development.

Dr. Brantley.

STATEMENT OF DR. EDWARD J. BRANTLEY, DIRECTOR, DIVISION OF INSTITUTIONAL DEVELOPMENT

Dr. BRANTLEY. Thank you Mr. Chairman.

[Senator Baucus administered the oath to Dr. Brantley.]

Senator BAUCUS. Dr. Brantley, in the interest of time, I am sure you have listened to Mr. Will's testimony and some of the questions that Senator Cochran and I have asked and the answers received of those questions with respect to title III.

I want to ask you some specific questions about problems that were mentioned during the course of that testimony.

Let us talk about eligibility. I want to enter into the record a September 18, 1979, memo to you, from your Chief of Program Development Branch. The memo states that the division found five community colleges in Kentucky ineligible in March 1979, and again, ineligible in June 1979, because they did not have "accreditation status, budget control and accounting authority."

Yet, on August 8, the five campuses were found eligible, in spite of continuing suspicions of the staff. In addition it appears that all data supporting eligibility were provided over the telephone.

I am wondering if this memorandum is accurate.

Dr. BRANTLEY. I think so, Senator.

Senator BAUCUS. The question, therefore, is how could schools that were twice declared ineligible, based upon their application, be declared eligible without written documentation?

Dr. BRANTLEY. The procedure for eligibility, Senator, is handled by the Division of Eligibility and Agency Eligibility, in the Bureau of Higher and Continuing Education. In other words, our division does not determine eligibility, that particular type of eligibility to which you are referring.

So, what happens in this case, we submitted the total list of institutions to the Division of Eligibility and Agency Eligibility and the results which came back to us indicated that these institutions were not eligible. We also had a meeting with the representatives of this particular division and went through a discussion of these institutions. The information which we received was that the institutions were not eligible based upon the criteria to which you referred.

Subsequently, the division continued its investigation, I would assume, and then, during the summer, we received the other information about the eligibility.

Senator BAUCUS. That is this same division which earlier determined the institutions to be ineligible, later determined them to be eligible?

Dr. BRANTLEY. That's right.

Senator BAUCUS. How was that determination made? Do you know? Who made that determination?

Dr. BRANTLEY. I don't know the person who did it.

Senator BAUCUS. How were you informed of the change in eligibility status? Was it written or oral?

Dr. BRANTLEY. It is written to us.

Senator BAUCUS. It is my understanding that a memo states that is not the case. Here is a note to you dated September 18, 1979, "Since no documentation was furnished by the Kentucky schools, all data was provided by phone."

Dr. BRANTLEY. Not to me, Senator. That information doesn't come to me. That information goes to the other division.

Senator BAUCUS. It is your division, though.

Dr. BRANTLEY. No, it doesn't come to our division. It goes to the other division, Division of Eligibility and Agency Eligibility. And then the other division informs us of the eligibility of that particular institution.

Senator BAUCUS. I notice on the staff technical review for Paducah Community College, one of the schools originally declared ineligible, that in response to the question on the review sheet, "Has the applicant been designated as developing institution?" the box is marked, "No.".

The instructions state, "If No," and you know this better than I.

Dr. BRANTLEY. That is right.

Senator BAUCUS. The applicant could not be funded. The school's proposal was rated and funded however for $175,000. Why was that school funded when in the funding of that school the "No" box was marked.

Dr. BRANTLEY. I don't know that particular response to that.

Senator BAUCUS. Let me ask the question differently. It is true, isn't it, that if the "No" box is marked the institution does not qualify?

Dr. BRANTLEY. If the "No" box is marked, that it is not a developing institution.

Senator BAUCUS. Right.

Dr. BRANTLEY. Then it should not be funded, unless there is documentation in there that justifies it. But ordinarily if a school is declared not to be developing it would not be funded.

Senator BAUCUS. Why do you suspect this school was funded then?

Dr. BRANTLEY. I couldn't say on that particular institution.

Senator BAUCUS. Are you familiar with it at all?

Dr. BRANTLEY. Not that particular case, no.

Senator BAUCUS. Who would be within your office?

Dr. BRANTLEY. The program person who did the work on the school would be familiar with it or the chairperson of the developing institution.

Senator **BAUCUS**. Somebody that works for you?

Dr. **BRANTLEY**. Yes.

Senator **BAUCUS**. It is my understanding that Durham College, in North Carolina, recently lost accreditation except for its medical laboratory technician program. Is that, to the best of your knowledge, correct?

Dr. **BRANTLEY**. That is true.

Senator **BAUCUS**. When was that?

Dr. **BRANTLEY**. It was during the summer. I don't know the exact date.

Senator **BAUCUS**. Can a school that loses its accreditation receive funding?

Dr. **BRANTLEY**. Not usually. I say not usually because you can have a certain status and not be an accredited school, but not usually is it.

Senator **BAUCUS**. My understanding is that with Hispanic and Indian schools you get an exemption from the accreditation rule.

Dr. **BRANTLEY**. There are exceptions.

Senator **BAUCUS**. But Durham is not a Hispanic or Indian school?

Dr. **BRANTLEY**. It doesn't fall into that category.

Senator **BAUCUS**. Was Durham funded this year?

Dr. **BRANTLEY**. We talked about Durham yesterday. It is my understanding, it is my personal understanding at this time that Durham College has not been funded.

Now I just heard Fred say that he has funded it, but my understanding is that Durham College has not been funded for this year. There has been a lot of discussion going on about Durham College, but we recommended originally Durham for funding. That was prior to learning that it was not ineligible, that it still had accreditation.

But then, after we found that out, we took Durham off of the list. As far as I know, no recommendation has gone up from our office again to fund it.

Senator **BAUCUS**. Well, it should be pretty easy to determine whether or not the school has been funded or not. Someone can answer that question.

Dr. **BRANTLEY**. It is very simple. I would think it would be very simple.

Senator **BAUCUS**. Are you saying it would not be funded? That your office would recommend it not be funded?

Dr. **BRANTLEY**. My recommendation to the Bureau has been that we not fund Durham.

Senator **BAUCUS**. Your recommendation is not to fund Durham.

Dr. **BRANTLEY**. That is right.

Senator **BAUCUS**. Because it is not accredited.

Dr. **BRANTLEY**. That is right.

Senator **BAUCUS**. You do not know whether it has been funded or not?

Dr. **BRANTLEY**. As of yesterday in the discussion we had it was stated that Durham College had not been funded.

Senator **BAUCUS**. For the record will you please get that information?

Dr. **BRANTLEY**. Be glad to find out.

[The material referred to can be found in the appendix.]

Senator **Baucus**. In a September 28, 1979, memo from the Director of the Division of Eligibility and Agency Evaluation, Mr. Profit, states, "A multipurpose complex," and Durham is a multipurpose complex, "institution, lacking comprehensive institutional accreditation will not be decided eligible to apply for institutional support such as title III."

Durham is a multipurpose complex and institution, isn't that correct?

Dr. **Brantley**. As far as I know it is. I guess. It is a college.

Senator **Baucus**. Therefore, this goes to the same set of questions, you don't know whether Durham has been funded or not?

Dr. **Brantley**. Well, the latest information that I have, Senator, is that it has not been funded. That is until Fred made his statement a couple of minutes ago.

Senator **Baucus**. Yes.

Your last information was given to you by whom?

Dr. **Brantley**. In the discussion we had yesterday.

Senator **Baucus**. With whom?

Dr. **Brantley**. With staff persons.

Senator **Baucus**. Your staff person. Who is that?

Dr. **Brantley**. That is Dr. Deese.

Senator **Baucus**. It is his understanding, therefore your understanding?

Dr. **Brantley**. That is correct.

Now yesterday I was in conversation with other people in the Bureau. The statement there was that it had not been funded.

Senator **Baucus**. Could you please name those other people?

Dr. **Brantley**. Oh, the people who were in the room at the time—Dr. Berry was in the room, Dr. Moye, Dr. Spearman—I don't know. It was a group of people. It was a room full of people. I don't know all of them.

Senator **Baucus**. They all agreed it had not been funded?

Dr. **Brantley** That was the statement that was made in the room that it had not been funded.

Senator **Baucus**. Let's take Canisius college. Two of the four readers who read the application did not recommend funding including your own program staff person.

Here are some of the comments:

> The data presented also indicates that the institution has progressed beyond the crucial need for funds for survival. This institution should be funded only after all other institutions much more in need and serving many more needed students have been adequately funded.

Yet, this school was given $380,000 for 1 year. Did you check the status of Canisius College to verify that it does indeed fit the description of a developing institution.

Dr. **Brantley**. It has been declared a developing institution from the materials which we have. Is that the information you were asking me?

Senator **Baucus**. Where is the determination available that it is a developing institution? Who made that?

Dr. **Brantley**. As far as Canisius College itself, Senator, is concerned, Canisius was grandfathered into the process for consideration this year because it was a funded institution in 1978. So, even if Canisius no longer met the criteria it still would be eligible to be considered for this year.

Senator **Baucus**. This goes to whether or not Canisius should receive funds. I am trying to find out the degree to which this process for either providing funds or not makes any sense.

The point is that two of the four readers recommended no funding. In fact, your own program staff person recommended no funding. One of the reasons for that recommendation was that the school is beyond the crucial need of funds for survival. That, in fact, seems to indicate it may not be a developing institution.

My question really is: Shouldn't you or someone in your office have been on notice that Canisius should not be funded? After all, two of the four readers said no. The program staff person said no. I am just trying to determine whether the process leads to the right decisions.

On the face of it there are questions about the status of Canisius and the statements made by the readers and by the program staff person. So, did you or somebody else look into this?

Dr. **Brantley**. I did not look into it, because I had no——

Senator **Baucus**. Did somebody in your office?

Dr. **Brantley**. Well, I would assume that someone reviewed the application. The application was reviewed by the staff and also by the people on the program, but I did not personally review Canisius College.

Senator **Baucus**. What happened here? Your program staff person said no. Two readers said no, and yet Canisius was given the award of $380,000 a year.

I am trying to determine why the school was given that award in view of the adverse recommendations.

Dr. **Brantley**. Senator, I can't say specifically why Canisius was recommended, just this particular school.

Senator **Baucus**. You are responsible for knowing, aren't you?

Dr. **Brantley**. I am responsible for knowing once the case is brought to my attention, yes. But I am not responsible for knowing every application that goes through because that is a staff responsibility and I review the recommendations when they come through to me. I look at the amounts of money that are given, how many recommendations and the like.

But, for each institution, I do not go back to the particular staff papers and look at those papers.

Senator **Baucus**. Could you, for the record, provide the information indicating why Canisius was funded in view of the questions we have been discussing.

Dr. **Brantley**. Sure.

[The material referred to can be found in the appendix.]

Senator **Baucus**. My next set of questions concerns Florida Junior College at Jacksonville. It received $153,000 to fund a consortium agreement with McManis Associates to run a seminar for 20 schools on "Planning for Fiscal Stability."

Several items concern me about this grant. First, the schools involved in this consortium are from all over the country: California, Michigan, Oklahoma, and Florida, to name a few States, thereby requiring a lot of travel expense. In fact, over $31,000 of the grant is for travel.

Yet, the regulations state, "The size of the consortium arrangement is limited through the number of institutions that can be effectively and efficiently served."

My question is whether consortium agreements that require so much travel are efficient.

It looks like a large consortium was put together inefficiently with nobody asking if this was the best way to meet these schools' needs.

It looks wasteful.

Dr. **Brantley.** Well——

Senator **Baucus.** Perhaps the same purpose could have been accomplished with a smaller consortium of schools located closer together.

Dr. **Brantley.** I guess so, Senator. But the proposal in terms of the recommendations and the like were recommended for funding to us, based upon the judgment of the people who read the evaluations and the like. So, we go on the basis of the expertise of these people who do the recommending to us.

This particular consortium, as I remember, is not the largest consortium we have. We have others that are larger.

Senator **Baucus.** You mean there is greater inefficiency?

Dr. **Brantley.** Well, I wouldn't say there is greater inefficiency. I would say there are some proposals that are probably larger than this one.

Senator **Baucus.** But certainly those arrangements are certainly questionable, it seems to me, in view of that regulation I cited; don't you think?

Dr. **Brantley.** I guess so. I would have to really read that particular proposal to see. I can't make the judgment having not read that particular proposal.

Senator **Baucus.** Do you have any idea how much travel money is spent by institutions and assisting agencies in this program?

Dr. **Brantley.** No, I do not have any idea.

Senator **Baucus.** Did you ever try to find out or has anybody tried to find out?

Dr. **Brantley.** I don't think so. I know this year when we asked about the amount of money going to assisting agencies that figure had not been kept. So, I don't think that particular evaluation has been made.

Senator **Baucus.** Is there any way of determining the amount of dollars spent by institutions and assisting agencies of title III money?

Dr. **Brantley.** We could only evaluate what is in the budget, but it would take an audit of the program to really say how much money is spent.

Senator **Baucus.** So far as you know there has not been that kind of audit?

Dr. **Brantley.** We do not have it at the program level, no.

Senator **Baucus.** Could you, as best you possibly can, for the record, indicate the amount of dollars spent for travel? Would you do that, please?

Dr. **Brantley.** For the record?

[The material referred to can be found in the appendix.]

Senator **Baucus**. Yes. I notice that McManis is charging 120 percent overhead. That amounts to $49,000 of their $132,000 contract. This is in addition to their fee of $12,000. On the face of it that seems a bit high. That doesn't leave many dollars going to the institution to educate students.

Doesn't that seem high to you?

Dr. **Brantley**. That particular phase of determination is not within my realm. That is for GPMD to evaluate, to say how many—what it is.

It is my understanding that the overhead rate for an agency would be determined upon their determined overhead rate. That would be my understanding. I don't know if that is high or not. I haven't dealt with overhead rates and how much. Ordinarily in the program, the institutions do not receive overhead costs any longer. I do not know how much the agencies are charging.

Senator **Baucus**. Well, you once were part of an assisting agency.

Dr. **Brantley**. Yes.

Senator **Baucus**. So you should have some idea.

Dr. **Brantley**. We did not have an overhead rate of 120 percent. So we could not have charged 120 percent. It would have been high for us. It would have in fact been illegal for us, because we didn't have that.

Senator **Baucus**. What would you have charged?

Dr. **Brantley**. I don't know what the overhead rate was. That was handled by the business manager.

Senator **Baucus**. What did you do at your assisting agency?

Dr. **Brantley**. I was the vice president for programs.

Senator **Baucus**. As a vice president did you have any idea, and can you give us any estimate, of what your assisting agency charged for overhead?

Dr. **Brantley**. As I recall it, Senator, we did not charge over 20 to 30 percent for indirect cost fees. I would have to find out. I can't be certain. I know we did not charge a large amount of money for indirect cost.

Senator **Baucus**. Well, 20 to 30 percent sounds pretty high to me.

Dr. **Brantley**. Well, the indirect cost figures, as I say, were determined by the business manager, not by the program people.

Senator **Baucus**. A third item I don't quite understand is what Florida Junior College received from this grant. While its representatives did attend the seminar, Florida Junior College received no more benefit than any other college. It seems this was merely an indirect funding of an assisting agency. Is that correct?

Dr. **Brantley**. I have not read Florida Junior College's proposal. I do not have the responsibility for reading proposals. So, I haven't read this proposal.

Senator **Baucus**. The question is, why don't you fund McManis Associates directly?

Dr. **Brantley**. That would be illegal.

Senator **Baucus**. But in effect isn't that what you are doing?

Dr. **Brantley**. No. The institution——

Senator **Baucus**. When I say "in effect," I mean the funds do go to the consortium, but it sounds as if the colleges themselves aren't getting very much out of it. Rather, McManis is getting the money indirectly and is the major beneficiary.

Dr. BRANTLEY. That may be true, Senator.

Senator BAUCUS. It may be true that the assisting agency is getting the major benefit.

Dr. BRANTLEY. I don't think the agency in general gets the major benefit out of the funds because that would have to come from moneys going directly to them.

There are approximately 214 assisting agencies in this program. I just don't believe the majority of those assisting agencies are getting that much money out of this program. I don't have the figure, but I don't think so in terms of a large amount of money.

Senator BAUCUS. The majority might not be, but do you think too many are?

Dr. BRANTLEY. I think that out of 214, some might.

Senator BAUCUS. That wasn't the question I asked.

Dr. BRANTLEY. I don't know if they are or not. We don't have that information, how much money they are making. I know out of the agency which I just came, we lost money on the title III program. Our costs exceeded the amount of money that we made.

Senator BAUCUS. I have a few questions concerning Eastern Arizona College. On the staff technical review prepared on April 24, 1979, the school received 85 appropriate points, too little to be considered for funding. Nevertheless it did receive a recommendation for $25,000.

On June 20, 1979; that is, a few months later, another staff technical review was prepared. On that technical review Eastern Arizona received 145 appropriate points and the recommendation for $100,000.

According to the documentation, a special committee was formed to review the ratings and comments of the four original readers.

Did you organize that special review committee?

Dr. BRANTLEY. I don't even know anything about Eastern Arizona College.

Senator BAUCUS. You don't recall this at all?

Dr. BRANTLEY. No.

Senator BAUCUS. Yet you are responsible for this college; isn't that correct?

Dr. BRANTLEY. I am responsible——

Senator BAUCUS. For the program.

Dr. BRANTLEY. I am responsible for the program, yes.

Senator BAUCUS. Including Eastern Arizona College?

Dr. BRANTLEY. Yes. But a review could take place. I would have to know the purpose of it and how it was——

Senator BAUCUS. Could you tell me what do you do?

Dr. BRANTLEY. I work directly with the branch chiefs and the section chiefs. During the time of the review of applications, I also review the applications which come to me as a part of the recommended amount. Now, in terms of this particular program, this particular school, I do not know at what point in the process it was reviewed.

During the negotiation of the grants, I establish a committee to work directly with GPMD. If a problem came up then this particular committee was to review it. But this does not seem to be that kind of case.

Senator BAUCUS. Do difficult decisions come to you? That is, difficult decisions to be made by your organization, but which your subordinates feel are too crucial and too important to be made by themselves?

Dr. **Brantley**. They bring them to me.

Senator **Baucus**. They bring them to you?

Dr. **Brantley**. Yes.

Senator **Baucus**. How many kinds of decisions like that do you make in a month?

Dr. **Brantley**. On this particular case here?

Senator **Baucus**. No; these kinds of cases.

Dr. **Brantley**. Well, I have only gone through one review process. There were not that many difficult decisions which were brought to me, but because I don't think we had that many difficult decisions to make as far as the total slate was concerned.

I would like to know what this particular case is. I will check into it. I don't know it at this particular time.

Senator **Baucus**. Can you give me some examples of the kinds of decisions you have made that were brought to you because they could not be resolved among your subordinates? I would like concrete examples. Not just general work descriptions, but concrete examples.

Dr. **Brantley**. Right. One decision that came to me from GPMD, the question had come up about Knoxville College. They had gone to Knoxville College and they made an audit and Arthur Stewart in GPMD came to me and indicated that on the basis of their recommendation, they thought a change should be made.

I made the decision to have a program person review that particular case, then, to report back to me what their decision was and then on the basis of their recommendation to me, I made the recommendation back to the system regarding Knoxville College. That is one case.

Senator **Baucus**. Explain that a little more fully. What are the details of that case?

Dr. **Brantley**. The details were that Arthur Stewart who is the branch chief in GPMD, through the audit materials which he had, recommended to me that Knoxville College could not possibly receive the level of funding which the program had recommended.

Then on the basis of his recommendation, I referred back to a program person to review, to determine whether or not that should be done.

Senator **Baucus**. Let us turn to another school. I hope you remember this one, it is Catholic University of Puerto Rico. Are you familiar with that school?

Dr. **Brantley**. I have heard of Catholic University, yes.

Senator **Baucus**. On a technical review summary the readers gave Catholic University scores of 20, 74, and 29. Remember the cutoff level, as you know, is 100. None of the readers recommended funding.

Let me read some of their comments. "Proposal does not follow guidelines. There is not sufficient information for evaluation. Budget, for instance, has not been fully rationalized. There is no real picture regarding how this institution is serving the students it now has. It does not seem reasonable that the school can add over 100 new people in 1 year. The mission is vaguely stated, as well as the use of funds."

The question is, Dr. Brantley, whether this sounds like an institution that should be funded, based upon those comments and based upon those readers' scores?

Dr. **Brantley.** This particular institution, Senator, was reviewed and in the documentation which you have given to me, I see that it was reviewed by Morris Brown, that it was in July, and based upon the review of that particular situation, he awarded the points for the school to move to a higher level.

Senator **Baucus.** That is correct, sir. That person gave the school 147 points and recommended a funding level of $250,000.

But the problem is this. Three readers—and, if readers mean anything, some weight ought to be given to their work—three readers gave extremely low, dismally low scores, compared with those on all the documents I have looked through. They recommended no funding at all. I read you some of the readers' comments.

Dr. **Brantley.** Right.

Senator **Baucus.** Yet in view of that, with no reason, no justifications, out of the blue, a program staff person, is it Morris Brown?

Dr. **Brantley.** Yes.

Senator **Baucus.** Awarded 147 points and $250,000. It seems to me there should be some justification at the very least for that completely different evaluation. I am wondering why there isn't any.

Dr. **Brantley.** In—well——

Senator **Baucus.** Remember, the proposal does not follow guidelines. That is what the readers are saying.

Dr. **Brantley.** Right.

Senator **Baucus.** They are charged with trying to determine whether or not these institutions should receive any money. The readers said there wasn't sufficient information for evaluation. At least they put down the reasons for their decisions.

Then we come along to your office and suddenly, lo and behold, high score, 147. Remember, the readers' scores were 29, 20, and 74; three separate readers, three separate scores. And then it comes up, lo and behold out of the blue, 147, with the grant given.

What gives?

Dr. **Brantley.** As I look at the staff person who read this particular proposal, as I look at the sheet here, the staff person who read this proposal gave 147 points.

Senator **Baucus.** We have already established that.

Dr. **Brantley.** The staff person has the option and the responsibility for making that particular judgment that this particular school should receive that kind of rating.

Our hope in terms of our staff will be that the staff has understanding about a particular school that readers may or may not have. Now whether or not that is the case in terms of these three readers, I can't be sure, because I don't know. But what we are talking about here is the judgment of the staff to make this recommendation for this particular school.

It is a wide variance. I agree with you wholeheartedly. But, what we are dealing with actually is just the judgment of the staff person.

Senator **Baucus.** Yes; but don't you think there should be some justification?

Dr. **Brantley.** I agree that the staff person should also provide—and this is what we recommend and emphasize to every staff person—that they should give the documentation.

Senator **Baucus**. Why don't they? You are in charge of the program. Therefore, aren't you responsible for the staff person's failure to provide documentation?

Dr. **Brantley**. I don't know if I am responsible for the failure, Senator. I am responsible for pointing out to the staff person what the procedure is which we have done.

We indicate this to all staff people and to all readers.

Senator **Baucus**. Let me ask you another question. How often do staff persons provide justifications when they have different recommendations?

Dr. **Brantley**. Thay are supposed to give it every time. They are supposed to give the same summary justification that everyone else gives. There is no difference in staff readers in terms of their justification. If they vary widely, our instructions to our staff——

Senator **Baucus**. I don't want to belabor the point. Frankly, it seems to me that you who are in charge of the program could make sure this office works better; that is, provide the necessary justification. It would be helpful.

You heard Fred Will speak this morning. He is obviously perplexed and frustrated because in his view there is insufficient documentation and justification for actions taken. This seems to be an example of that.

Dr. **Brantley**. Well, I think that as I listened to Fred, Senator, it seemed to me he was saying that there is a need for greater documentation in terms of the funding levels. We have talked to him about this, but in terms of the recommendation, there is a form which the staff reviewers and the field reviewers or readers must fill out. Those are very extensive.

That is the basis for coming up with points. So I believe in most of the cases, and most of the cases that I have seen. I haven't reviewed all of the records, but the documentation is rather full.

Senator **Baucus**. Frankly, I have lots of other examples here, but in the interest of time I will not discuss them all.

Senator Cochran.

Senator **Cochran**. I have no questions, Mr. Chairman, of this witness. Thank you very much.

Senator **Baucus**. In that case I will ask a few more.

Dr. **Brantley**. All right.

Senator **Baucus**. Let us take Oakwood College, in Alabama. I will read you a list of recommendations at different periods of time given by field readers. One is $560,000 for 3 years for Oakwood; $207,000 for one year; $832,000 for 3 years and $1 million for 3 years and $800,000 for 3 years.

I also notice that they received only 113 points, which is very low. Most of the schools that received funding received a higher number of points.

Yet, Oakwood received $1.26 million for 3 years, $262,000 more than the highest recommendation. In view of the low point score, how do you account for an award that is above the highest recommendation.

Dr. **Brantley**. Yes.

Senator **Baucus**. Again, no justification.

Dr. **Brantley**. No justification for the funding level.

Senator **Baucus**. Correct.

Dr. **Brantley**. This is true. I think this is a problem and a mistake, but not a mistake here. We did not require it in this funding cycle. I think it is something that we need to do. But, I have no justification for this particular recommendation by the staff other than the staff person made the recommendation. The staff person, using their judgment, made that recommendation.

Senator **Baucus**. It sounds terribly subjective. All we see is amounts and we do not know why.

Dr. **Brantley**. Well, the amounts which are recommended, they are recommended on the basis of not the funding that you see here, but the evaluations which the staff people make in the evaluation forms. There is an evaluation form which they fill out which forms the basis for their justification for moneys.

The next step would be, if I understand the position that GPMD is holding to, would be that there should be some justification for each funding level, which is a different thing altogether.

Senator **Baucus**. Yes; but the problem is this. My staff looked through the whole file. We tried to find out what in fact was going on here, not to create problems, but to try to determine whether this program was working.

Dr. **Brantley**. Yes.

Senator **Baucus**. There was nothing in the file which indicated why Oakwood was granted $262,000 above the highest recommended level. If it is in some other file that would be helpful.

Dr. **Brantley**. No.

Senator **Baucus**. We couldn't find it.

Dr. **Brantley**. No; no other file.

What I am saying Senator, in the file for Oakwood, the justification for funding should be based upon the forms which we use for evaluating the proposal. That should be the basis for determining the moneys that they will receive.

Senator **Baucus**. Who made this recommendation for additional funding? Was it your staff or somebody above you? Who made it?

Dr. **Brantley**. It would be the staff person who made the recommendation as far as the information that I would have.

Senator **Baucus**. The staff person recommended $1 million. So, it wasn't a staff person. At least it doesn't appear to be.

Dr. **Brantley**. If the staff person did not make the recommendation Senator, then I do not know who made the recommendation for it to be at that particular level.

Senator **Baucus**. Thank you very much, Dr. Brantley. I appreciate your testimony. In the interest of time we are going to have to proceed further.

Our next witness is Dr Mary Berry.

[Senator Baucus administered the oath to Dr. Berry.]

STATEMENT OF DR. MARY BERRY, ASSISTANT SECRETARY FOR EDUCATION, U.S. OFFICE OF EDUCATION

Dr. **Berry**. Thank you very much, Senator. I appreciate the opportunity to testify on this program and I appreciate the fact that you have singled out title III as an example of how programs are managed under the contracted and delegated authority, which is the jurisdiction of this subcommittee.

I do have a statement which I would like inserted into the record, with your permission.

Senator **Baucus**. It will be inserted in the record at the conclusion of your oral testimony.

Dr. **Berry**. Thank you.

I would like to make about eight brief points in response and then I will be pleased to answer any questions.

Let me just say that I am very sensitive, Senator, to the comment of the Congressman from Montana about the importance of geographic isolation as a criteria in this program, having come here from your neighboring State of Colorado where we have some geographical isolation also. I just point that out in passing. I am sensitive to that.

Let me say also, I am a very understanding person about Fred Will's fervent testimony as Director of Grants and Procurement Management Division on this program. I do understand that every manager in the Federal Government to whom I have spoken wants more resources and would like higher status for his program.

So, that does not surprise me. Fred is a very energetic manager and I very much appreciated the time I have worked with him.

I should make one other very quick caveat before I make the eight points. That is that my direct involvement with the title III program, in terms of supervising it, dates only from July 2, this year, when, in the absence of a Commissioner of Education, I became directly responsible rather than general supervisor for the programs in the Office of Education.

One of the first things that I did at that time, Senator, was to ask for a review of title III and an updating on how effectively title III was responding to the GAO report and the other matters that have been discussed here.

By July 11, and I have the papers we will submit for the record. I had in hand an action plan with four parts designed to improve the program.

Let me say also that I would be the last to say that everything in title III is perfect. I have never made that statement and would not make it. I do believe that some improvements have been made and I believe that Senator Cochran has pointed out the new legislation that we have proposed and which has been passed by the House will address some of the deficiencies that Mr. Will has talked about.

Now, what I have done since I have been dealing with this program is to try to make sure that some of these deficiencies do not occur again in the 1980 cycle.

First, we have moved up the timing for the awards to April 1980, so that the staffing problems that Mr. Will talks about, with GPMD not having the time to make sure that adequate justifications are available before it can go back and say to the program, "You haven't provided adequate justification because we are nearing the end of the fiscal year." That will not happen again.

We have already put that change into place. We have already put out the notice of closing. In fact, we know that this will happen and that should alleviate that difficulty.

One of the first things I asked Mr. Will was if adequate justification was not available, why did you fund the programs, since you have a responsibility not to fund them. He pointed out to me the closeness of the fiscal year and the other problems that he stated here.

So, we moved up that time. That should help us solve that problem.

The other thing is, I was very concerned about the lack of written justification in the files when in fact a change had been made in what the readers had recommended and the staff had recommended and what somebody else has recommended. I have given written instructions that there must be written justification before GPMD will act on any of the recommendations.

What I am trying to do is look toward the future.

Senator BAUCUS. Will you provide those written instructions from you for the record?

Dr. BERRY. From me.

Senator BAUCUS. Yes.

Dr. BERRY. Yes, from me personally.

We will give you all of that for the record.

[The instructions referred to can be found in the appendix.]

Senator BAUCUS. Thank you.

Dr. BERRY. Also, Senator, with regard to the cases of conflict of interest and there were one or two that were called to my attention, I immediately asked counsel to investigate them and I also asked the Inspector General to investigate them.

I must point out, though, on the matter of conflict of interest, it is not unheard of and is common practice in Federal programs to have a peer review system where people who come from the institutions and who have the greatest expertise are the ones who review applications. This is not an uncommon practice.

What is illicit and what is wrong is when a person reads proposals that are related to an institution where he has some kind of financial interest or where he will benefit from it. There is nothing wrong with somebody who has expertise reading programs. If we didn't do that, in none of our programs would we have that kind of peer review and we would sacrifice that expertise.

But we have worked on the conflict of interest problem and we have tightened it up and we have a schedule for the audits of the assisting agencies which have been pointed to as a problem and we will provide it for the record. They have already begun. We will give you that schedule. We will also give you a schedule for the monitoring of institutions.

[The schedules can be found in the appendix.]

So, what I am saying to you, Senator, is that I have tried to look to the future and to make sure that none of these excesses harm what is an extremely important program for those institutions that receive funding from it at this time and to make sure the administrative management is what it should be.

I have finally an action plan related to administrative reorganization and staffing changes in the program. However, I am not at liberty to share them, because I wish to discuss them with the Secretary-designate, since they are rather farreaching. Once she is sworn in, I will discuss them with her.

I think you will see by the time that the grant cycle takes place there will be some administrative changes in the management of the program.

Thank you very much, Senator.

Senator Baucus. Thank you very much, Dr. Berry.

I appreciate your candor in agreeing there have been problems with the program, and also appreciate the steps you seem to be taking to remedy those problems.

But so we get a little better understanding of what those problems are and to make sure that in fact the problems will be remedied and hopefully prevented in the future, could tell me whether you have read the GAO report.

Dr. Berry. Yes; I have read it and I have also heard testimony from the members of GAO.

Senator Baucus. In what way do you agree with the findings?

Dr. Berry. I agree that there needed to be a clarification in the program purposes. In fact, in my role as Assistant Secretary, I worked with the review process and the development process for the new regulations in which we tried to clarify program purposes, and I was a part of the process to develop the legislation that was passed on the House side to make sure there was some clarification of program purposes. I agree with that.

I agree also in the case of avoiding conflicts of interest and the rest of the points that GAO made as HEW responded at the time. We didn't differ with the necessity for making changes. We didn't differ with the fact that there had been problems. That is not the point at issue between us.

I might make one point that on the matter of discretion, discretion of managers and readers and the like, it is common practice in any Federal program where you have readers that managers have some discretion that they can exercise once the readers have made a judgment.

I have found in dealing with people who have an interest in these programs and who are funded by them that, when discretion is exercised and they get funded, they think that is great. When discretion is exercised and they don't get funded, they think that is bad.

There is nothing wrong with discretion. What is wrong is untrammelled, unconstrained discretion without any written justification to explain why some figure went from 0 to 100 or 100 to 0.

Senator Baucus. As has been the case in title III.

Dr. Berry. I agree that has been the case, which is the reason for my instructions concerning the justification.

Senator Baucus. What has your role been since you took direct responsibility for title III?

Dr. Berry. This was in July. It is only 5 months, Senator.

Senator Baucus. Since July, what has your role been in the title III program?

Dr. Berry. Well, the first thing I did was to call together Jim Pickman, Al Moye, and John Ellis, and Len Spearman, and all the affected parties, including the people at GPMD to sit down and talk about all these problems that are in the GAO report and that we address some in the regulations; what in fact were we doing to see to it that these kinds of problems did not arise and whether we had a plan for resolving them.

That is the first thing I did.

Second, I did not act on the slates for the program. In fact, by the time the slates for the title III program were ready to go to grants and procurement management, my 30-day commission as Acting Commissioner had expired. So I delegated that authority to John Ellis, the Executive Deputy.

However, I have had continuing discussions with the staff in title III, with Ed Brantley and Al Moye and the rest to implement the three action plans to make sure that by the new grant cycle we have none of these things happening again and to develop the administrative action plan to which I referred.

Senator BAUCUS. I appreciate that. One problem I see in insuring these actions are taken is that the dates I have given today with respect to the various institutions have been since July.

Dr. BERRY. Right.

Senator BAUCUS. So the problems I have outlined did not occur in the last fiscal year or in January, February, or March of this year. One memo was dated August 8. Another was dated September 28, and so forth.

I just mention that to underline the need for your perserverance here to make sure the kinds of changes you are talking about are in fact put into place.

It is one thing to say that was a problem in the past and you have taken care of it. I am trying to insure that in fact you are taking care of it.

Dr. BERRY. We will know, Senator, whether we have in fact taken care of it when we examine what happens in the current grant cycle.

Let me point out that when I raised with GPMD the question about why they had funded these programs at the dates you refer to, August and September dates, we got the kind of response that Mr. Will gave here this morning, that the slates came to us so late in the year that there is inadequate time to go back and ask for justification and we don't want $120 million to go back to the Treasury.

In other words, you are entering the process at too late a time for us to turn it around at this moment and so let's make sure you turn it around by the next time.

I am sympathetic to that view. I am simply saying that had I had the responsibility earlier—I can't say that. You can't walk in another person's shoes.

But I am aware of what the problems are now. We have taken steps to see that they do not recur. I have raised questions about the funding slates that are in existence now, and I am aware that the process was far along by the time I got involved in it; that there were people who had different scores and readers and all the rest of that; that those problems did exist and I do not deny that they existed during the current grant cycle.

Senator BAUCUS. Have you been personally involved in any funding decisions?

Dr. BERRY. I have now before me for decision—since I have now personally involved myself in these matters and have asked people to defer a decision until I have had a chance to look at it—this whole issue of Durham College which you asked Mr. Will about.

Durham College, unless someone is doing something I told them not to do, has not been funded. What I am doing is reviewing the details of its accreditation status to try to see for sure whether in fact we are treating the college consistent with the law. No decision has been made to fund them.

There was an earlier decision in which I was involved, involving a college someone called me about that you mentioned earlier, I think Northeast State College, that got a planning grant. Their proposal was in such a shape that I was informed that they should not be funded.

However, I was told that it made sense given the geographic region where that college is located, which has a population that is underserved, a large number of Indians. I was told that it made sense to give them a small planning grant so that they could work on trying to submit a better proposal next time. I did intervene directly there for that reason and suggested they get a small planning grant.

Those are the two instances that I recollect at this time that I have had an involvement.

Senator BAUCUS. I encourage you to be as forthcoming and cooperative in the future. I raise that point because my staff tried to get a list of the information from your office, the same information you said you would supply for the record at Senator Pell's hearing.

Frankly, my office was unable to get the information. I mention the point because I believe that with cooperation, things could have been provided more forthrightly and quicker. I hope in the future when we make requests for information they will be honored more quickly and efficiently and forthrightly.

Dr. BERRY. Senator, if I may respond. What I stated at Senator Pell's hearing on three of the questions asked me was we thought after consulting with staff who happened to be sitting next to me at that time, we thought we could provide that information for the record.

I did not mean that I had it immediately in my hand that day. What I meant was that they could collect it. We have collected some of it, the question of who came from and went to assisting agencies and I remember there were others; or we have it available here today to provide to you. We have not yet provided it to Senator Pell's subcommittee, but will also provide it to his, for the record.

[The material referring to assisting agencies can be found in the subcommittee files.]

Senator BAUCUS. Thank you. I appreciate that clarification.

Are you aware of the problems some schools have in accounting for the Federal money? It goes somewhat to the point Senator Cochran has made.

Dr. BERRY. I am aware of those. One of the action plans that I referred to addresses that. One way to deal with that is to step up the auditing and monitoring process of the schools which has been shamefully handled in the past. That is one way to do it.

I would not like to see us intervene directly by trying to send Federal people to sit on the campuses day by day in a receivership kind of status. But we do need to monitor them. We need to audit them. We need to also make sure that in the title III grants that we give to places that have fiscal management problems, part of the funds are used for fiscal management. That seems to me to make very good sense, since that is consistent with the statutes. We have the list of the auditing and monitoring schedules and we will be requiring them to have some emphasis on fiscal management.

One of the problems, also, Senator, has been that some of the assisting agencies that are supposed to be assisting have not had the capability to help with fiscal management either. As you know, the current law requires that participating schools have a relationship with an assisting agency. This is one reason why in the new legislation we propose they not be required to have one. They can have one and we will focus our efforts on making them or encourage them to do so, but we can't make them. We will encourage them to take on people who can help them with the very problems that exist there.

Senator **Baucus**. So you are suggesting that it is not good public policy to require assisting agencies?

Dr. **Berry**. I do not think it is a good public policy and our position in our reauthorization proposal was to take out the requirements that they exist.

Senator **Baucus**. I agree with you. It does not make sense because the more you require something like that the more you encourage poor management.

Dr. **Berry**. That is right.

Senator **Baucus**. I have no further questions. I want to thank you very much, Dr. Berry.

Dr. **Berry**. Thank you, Senator.

Senator **Baucus**. Senator Cochran.

Senator **Cochran**. Senator, I want to commend Dr. Berry for the efficient way in which she has approached these problems and helping to draft and obtain passage of legislation that I think will go a long way toward helping cure some of the problems which will be identified.

I, too, am impressed with the fact that the requirements to use assisting agencies or consulting firms has been eliminated.

I want to ask a question about whether or not in your judgment the expanded suggestions from the Committee on Education and Labor which are contained in the report on the legislation to which we are referring will be implemented and carried out by the Office Of Education to help develop a better breadth of information from which to make assessments about whether or not the moneys that are allocated under the grant programs are being used in a way that is consistent with the purposes of the act. The information that would be required to be supplied from grantees includes, according to the report, a statement of work or services to be performed; a time schedule for performing such work or services; a description of the qualifications of the institutions or agencies for carrying out the work to be performed; a payment schedule, including a statement that payments will be made upon completion of services; reporting requirements, including an agreement with an assisting agency or institution which requires that the agency submit regular progress reports to the developing institutions; the grantee which is responsible for forwarding a copy of such reports to the grants officer in the Office of Education; retention and access of records provisions; termination rights for the developing institution; a detailed breakdown of the assisting agency or institution budget for each year and the cost for all services; provisions assuring that the grantee will retain supervision and administrative control over the provision of services under the agreements, as well as any other special conditions appropriate to the agreements.

The question, I will repeat, will those recommendations as to what should be included in accounting procedures and reports to be submitted be carried out and be made a part of the Office of Education regulations under this title?

Dr. BERRY. Senator, those will be carried out by the new Department of Education as they are stated in the statute, assuming that they will be enacted also on the Senate side and become legislation. They are good practices and would be carried out in any case and in fact, would make it more possible for us to determine exactly what it is the agency has provided to the institution and make us able to trace the flow of funds very carefully, which is a difficulty that we have.

I do not mean, by my statements, to tar with a broad brush all assisting agencies and all of their activities, because there are some that, in fact, according to the word of mouth evidence that I hear when I visit institutions, have helped schools work on their curriculums and have done other things.

I also noted the comment you submitted from Dr. Peoples whom I respect very much. But, in fact, we do need a better way to trace the funds and a better way to have accountability, and the legislation does not require the agencies. But, where they exist, it is simply good practice to do what you have read from that statute and that is exactly what we will do.

Senator COCHRAN. Well, I congratulate you on the work you are doing in this effort to help improve title III, improve the management practices. I think it is a very important program for us to continue. It has meant a great deal to many small and very dedicated institutions who are trying to fulfill an essential role in higher education in the United States. I appreciate your being here and thank you for your help and contribution to the hearing.

Dr. BERRY. Thank you.

Senator BAUCUS. Thank you again.

Just for the sake of repetition, we all agree title III is a good program. But we all agree there have been a lot of problems, and that we are going to work to solve them. I only hope we don't leave today thinking everything is going to be fine and think things will be fine.

I mention this because either this subcommittee or one of the other authorizing committees, I am sure, will come back and look again at title III in the not too distant future. The actions that are taken or not taken during the next months and years are certainly going to be judged in light of statements that have been made in the last few days and weeks.

I hope that those judgments are positive and not negative.

Dr. BERRY. Senator, I would welcome the close scrutiny and review by this committee or any other after the 1980 cycle to see whether all the promises I have made do in fact come to pass and whether we can stand here with having the written justifications and having all the information available and be better able to explain precisely how the process went than we have been in the past.

Senator BAUCUS. Thank you very much.

Dr. BERRY. Thank you.

[The prepared statement of Dr. Berry follows:]

PREPARED STATEMENT OF DR. MARY F. BERRY

Mr. Chairman and members of the Subcommittee on Limitations of Contracted and Delegated Authority, I am pleased to be here today to participate in your discussions on the Title III, Developing Institutions Program of the Higher Education Act of 1965. In these brief remarks, I would like to comment on administrative actions we have taken to improve the management of this program and to describe the administration's legislative proposals for the reauthorization of Title III.

The present Title III program awards grants to institutions which are outside the mainstream of academic life and are struggling for survival. These awards may be used for four basic areas of institutional development: curriculum, student services, faculty and staff development, and fiscal and administrative management. Since the creation of the program in 1965, Title III awards have enabled many schools to take important steps toward self-improvement and increased self-sufficiency. For example, using Title III funds:

(1) Canisius College, a small church-related college in Buffalo, N.Y., (a) reduced student attrition by 12 percent through a student counseling program, (b) placed 400 students in jobs and helped another 100 gain entrance to graduate school with its Title III-funded career development center, and (c) reorganized its registrar's office and computer center and established offices for planning, research, and personnel.

(2) East Los Angeles Community College, a two-year institution in California serving primarily Mexican-American students (a) developed an English language laboratory so that students can learn English at their own pace at any time, (b) developed new bilingual courses for secretarial training, office management, and medical records technicians, and (c) reorganized their student services and financial aid offices.

(3) Mississippi Valley State University, a new predominantly black four-year public institution in Itta Bena, Miss., provides remedial education and private tutoring for 150 students daily. This program has been cited by the State Board of Education as an exemplary program.

(4) Eastern Montana State College, a four-year institution in Billings, Mont. (a) created a special program of financial-aid counseling for its American Indian students, and (b) established a faculty development program to allow an isolated faculty's skills to be upgraded and obtain terminal degrees by providing them with release time and summer advanced study.

(5) Alabama A. & M. in Normal, Ala., (a) established a university-wide student needs testing service to provide teachers and counselors with a basis for helping students, and (b) increased the number of faculty holding terminal degrees from 31 to 46 percent between 1975 and 1979.

(6) West Virginia Wesleyan, a four-year college in Buckhannon, W. Va., trained over half its faculty in the application of each discipline to the problems and opportunities of Appalachia. Eighty-six courses and course units now reflect regional aspects in their curricula.

(7) Burlington County Community College in Pemberton, N.J., established a basic studies division. Some 300 students per semester enroll in courses designed to improve mathematical, English, and reading skills.

Although the Title III program has made important contributions to many schools, we are aware of the need to improve the management of the program. During the past 32 months, we have taken significant administrative steps to clarify and improve Title III. In taking these steps we have sought to insure that the schools that need program money the most receive it, and that funds are used wisely and in accordance with program goals.

Some of these steps went into effect last fiscal year; others will be initiated in the coming year. Our efforts have focused on three major areas: clarification of program purposes, the award process, and grant monitoring.

CLARIFICATION OF PROGRAM PURPOSES

New regulations that went into effect in May 1979 include quantifiable criteria for determining program eligibility: average educational and general expenditures per full-time-equivalent student and average basic educational opportunity grant awards per FTE undergraduate. These new criteria allow for consistent determination of which schools are eligible for funding; earlier guidelines lacked this consistency because they did not rely so heavily on quantitative criteria.

In the past, Title III was actually two programs, an advanced program and a basic program. However, criteria for determining which schools were in a more advanced state of development were not clear. In view of the ineffectiveness of this separation, the programs have been united.

The new regulations require that each Title III institution submit a long-range development plan. This plan is to include long- and short-range goals, criteria for measuring progress, and procedures to monitor funded activities against the plan. Points are awarded during the selection process for proposed activities that contribute to long-term institutional stability, improve administrative capacity, and improve management of Federal funds.

AWARD PROCESS

The Title III program improved its orientation program for the field readers who reviewed and rated the fiscal year 1979 applications. Readers participated in a 1½ day workshop on the Title III program and were given guidance on how to score applications. Field readers also received a mock Title III application before coming to Washington for the review process. They then participated in small group sessions in which their ratings were analyzed.

An increased effort was made during this last funding cycle to avoid potential conflicts of interest among field readers. Each reader had to sign a conflict of interest form and was informed by letter that a relationship with an assisting agency, as well as with a college, could lead to a conflict. In cases where a reader did have an apparent conflict of interest, the application was reviewed by a new panel.

During the fiscal year 1979 Title III grants process, the Inspector General's office conducted a spot review during the award review process to determine the adequacy of OE procedures.

In the past year, the Office of Education paid more attention to the subcontracts given by participating institutions to "assisting agencies." The current statute requires schools to undertake Title III activities in cooperation with assisting agencies, which may be other schools or private consulting agencies. In the past, the responsibility for assuring that the performance of assisting agencies met program goals has not been clearly understood and the value of services received has been questioned. Consequently, OE took steps during the fiscal year 1979 negotiations process to inform Title III institutions what the letters of intent they had signed with assisting agencies should guarantee them. Sole source justification was required where competitive bidding was not used.

MONITORING

Three major assisting agency organizations—Tactics, McManis Associates and the Action Consortium—and their member agencies are being audited or are planned for audit. In addition, the schools that serve as coordinating institutions and a sample of schools that have received services from these organizations will be audited.

By the end of this calendar year, program staff will complete intensive site visits at 37 institutions that appear to be facing particularly difficult management problems; another 70 such site visits will be completed by the end of the 1980 fiscal year.

During the fiscal year 1980 process we will be making a number of additional changes:

We expect to complete the review of applications and notify institutions of grants by April 1, 1980. We expect to complete negotiations of award amounts by June 30, 1980. April 1 notification means that grant awards will coincide more closely with the academic year, allowing institutions more time for planning for the use of Title III funds. It also allows ample time for the identification and resolution of any problems that may arise during the award negotiation process.

Applicants will be allowed to have only one assisting agency relationship. We expect that this change will lead schools to scrutinize carefully potential assisting agencies and the services they provide. OE will require that, wherever possible, a competitive process must be used in the selection of an assisting agency.

Where it is necessary to reconcile reader evaluations, a written justification will be required before award decisions are made.

LEGISLATURE PROSPOSALS

Neither the original Title III legislation nor subsequent reauthorizations defined either a clear purpose or a focused clientele for this program. In recent years there has been increasingly sharp competition for the limited funds available. This increased demand from a wide variety of institutions has shown even more dramatically the need to clarify the purpose of and the clintele for the Title III program. To this end, we are proposing that a new and more precise definition of developing institutions be included in the law.

Our experience with administering the Title III program over the past decade has highlighted several weaknesses which our reauthorization proposals address. Many institutions have received Title III funds for over a decade without demonstrably becoming stronger. Nothing in the current legislation encourages recipients of Title III funds to develop or implement long-range plans which will promote their economic self-sufficiency. The General Accounting Office has been especially critical of this situation.

Moreover, the existing law does not encourage States to assume concurrent responsibility for strengthening public developing colleges through careful planning. Close cooperation from the States is necessary in order for many of these institutions to move toward academic and fiscal self-sufficiency.

The legislative changes which we are seeking would provide statutory amplification of the administrative progress we have made thus far:

First, we propose to incorporate in the statute new eligibility criteria. Under these criteria, an institution's statutory eligibility to participation in Title III would be based on its level of enrollment of students from low-income families and its average expenditures per student. The proposed legislation indicates that this program is intended to help institutions become self-suffiicent.

Second, we propose to create a new category of "one-time" Title III awards to provide an incentive for institutions to "graduate" from the program.

Third, we propose to create a new program of challenge grants to encourage State and private support for Title III institutions' development activities.

ELIGIBILITY CRITERIA

Evaluations and reviews of the programs have pointed out the lack of clarity with regard to the definition of a developing institution.

We believe the education of large percentages of economically and academically deprived students to be characteristic of institutions that are struggling for survival and isolated from the mainstream and which are also contributing to a desirable public purpose. In our current regulations, we have used the average BEOG award to measure the extent to which colleges are serving these students.

Relatively low operating expenditures per full-time equivalent student is strongly correlated with a lack of financial resources. We have used this criterion in our regulations for identifying institutions with limited financial resources which are struggling for survival" for financial or other reasons.

Our experience in the first year of using these criteria indicates that they have simplified program administration and provided more equitable treatment for all institutions. We hope that the Congress will adopt, as part of the Title III statute, the principle of focusing assistance on schools with limited resources serving low-income students.

NEW AWARD CATEGORIES

The legislative proposal further provides that developing institutions have the option of applying for one of two types of awards: (a) A grant of 1 to 3 years' duration, after which the institution could recompete for another award, or (b) a larger one-time grant of 4 to 7 years, receipt of which would end eligibility for Title III assistance.

The longer and larger awards would allow institutions at a certain point in their development to opt for the security of a substantial, long-term commitment that would permit them o pursue more exensive development plans. In addition, acceptance of this award would put a limit on future participation in the program, an issue frequently raised by critics.

CHALLENGE GRANTS

The bill also includes a new program of "challenge grants." This initiative would have a separate authorization of $50 million. These grants would only be awarded to public and private institutions when State or private sources are willing to match the requested funding 50-50. It is our hope and expectation that this would stimulate a partnership between the Federal Government and the States, in case of public institutions, and the Federal Government and the private sector in the case of private institutions.

We need to encourage stronger commitment by institutions and by the States. At a very basic level, there is no stronger commitment that a financial one—particularly in this day of stringent budgets. I believe this proposal, particularly in combination with the proposal to allow larger—long term commitments, will go far in fostering development and growth instead of patchwork remediation.

The steps that we have taken and those that we are proposing are aimed at building on the existing strengths of Title III to achive a more sharply defined purpose, clearer strategies for development, and better management.

Thank you, Mr. Chairman. I would be please to respond to any questions the subcommittee may have.

Senator BAUCUS. Our next witness will be Dr. Leonard Spearman, Associate Deputy Commissioner for Higher and Continuing Education.

STATEMENT OF DR. LEONARD H. O. SPEARMAN, ASSOCIATE DEPUTY COMMISSIONER FOR HIGHER AND CONTINUING EDUCATION

Dr. SPEARMAN. Thank you Mr. Chairman.

[Senator Baucus administered the oath to Dr. Spearman.]

Senator BAUCUS. Dr. Spearman, would you clarify for us what your responsibilities are with respect to title III.

Dr. SPEARMAN. I am Associate Deputy Commissioner for Higher Education. As such, I am the alter ego of the Deputy Commissioner for Education, Dr. Moye. It is my job to review with the division directors all programmatic decisions before final recommendations are made to the Deputy Commissioner.

With respect to the title III program, that begins with the very first step in the process. The preparation of an award slate, the selection of field readers, and the review of the slate itself before it goes to the Deputy in terms of geographic distribution, in terms of money and in terms of all of the things that go into making up a slate that will finally be submitted to him for presentation to the Acting Commissioner of Education are also my responsibilities.

Slates are reviewed at my office before the final recommendations are made.

Senator BAUCUS. So you go through the slates. Is that correct?

Dr. SPEARMAN. Yes.

Senator BAUCUS. How many changes have you made in the slate each year?

Dr. SPEARMAN. I have been with the title III program approximately 3 years, sir. Before that I was Associate Commissioner for Student Financial Aid.

How many changes have I made personally?

Senator **Baucus**. Yes; you and Dr. Moye, one or the other or both?

Dr. **Spearman**. Well, Senator, let me see if I can shape the question. I can make a change in the dollar amount. I have made changes in the dollar amount that has been recommended by the staff, but I have also made other changes; or I may have been a part of changes in an institution's rank. So, when you add these up I have no idea.

Let me give you an example.

Senator **Baucus**. How many changes have you made in dollar amounts?

Dr. **Spearman**. I don't have the slightest idea. I would roughly say about 10 per year.

Senator **Baucus**. I would like to have the staff hand you a document. It is a list of schools that you gave Fred Will near the end of this fiscal year, about September, where you tell him to insure that certain schools are funded. When did you give Mr. Will this list?

[The list referred to follows:]

	Current	Approved	Additional	Final
Boricua	174,000	136,000	64,000	374,000
Edward Waters	840,000	144,000		[1] 1,040,000
Baker-Haskell	149,000	38,000	38,000	225,000
Freed-Hardeman	150,000	115,322	56,000	265,322
Roosevelt	250,000	50,000		300,000
Medgar Evers	400,000	50,000		450,000

[1] 2 yr.

Dr. **Spearman**. Yes, sir, I did give Mr. Fred Will this list. This was submitted to him on September 28, 1979. This is correct. The staff was notified by GPMD several days earlier that we had approximately $1.2 million unspent in the title III appropriation, sir.

I asked the staff to go back and see whether there were institutions that had suffered a serious cut in the amount that was appropriate for them and whether certain recommendations could be made to assist those institutions in restoring the amounts that the staff thought was proper.

The staff made a review and met with me and recommended certain institutions. I do not have the document, but I can provide it for the record, more than 10 schools recommended for an increase in funds.

During the last days, as Mr. Will has so correctly pointed out, there were so many grants attempting to be processed, he asked me to rank them in an order of priority in terms of those institutions that we felt deserved most consideration in terms of making any changes.

These institutions that you see before you represent a ranking on my part, based on recommendations from the staff of the Division of Institutional Development to prioritize those institutions that needed additional assistance.

Senator **Baucus**. You stated the document was provided to you by the staff.

Dr. **Spearman**. I have that document. I do not have it here. I have such a document.

Senator **Baucus**. Yes.

Dr. Spearman. All of the schools that were recommended for review and the reasons I presume for that recommendation were presented to me.

Senator Baucus. You will provide that document?

Dr. Spearman. Oh, I certainly will.

[Document referred to can be found in the appendix.]

Senator Baucus. Now that document lists 10 schools; is that correct?

Dr. Spearman. I am saying 10. Several more schools than you have on this list.

Senator Baucus. About 10?

Dr. Spearman. They are 10 or 12.

Senator Baucus. Describe to me please your recollection of your conversations with the staff or what the staff memo said that led you to allocate additional dollars for these particular schools. What are the reasons for selecting these schools and their levels of additional funding?

Dr. Spearman. Yes.

Senator Baucus. After all, this document is dated September 28. It is just over a month and a half ago.

Dr. Spearman. That's correct.

Senator Baucus. You must have some recollection of it.

Dr. Spearman. The awards were made on September 30. Yes, I do have some recollection on most of them.

Boricua College is located in New York. It is a Puerto Rican Institution. It is primarily established for Puerto Rican students. It was established several years ago as a 2-year college and more recently by the State of New York was authorized to offer 4-year education.

It is the very kind of institutions that title III, I believe from its inception, had been concerned about, though primarily in the 1960's with black institutions. As an institution making a special appeal to provide an alternative form of education for Puerto Ricans and with a request that exceeded the amount that we had awarded, it was chosen for additional funds.

One, because the application justified it, and two because we had additional funds in which to make that award.

That is the basis for that one.

Senator Baucus. There were 400 other schools competing.

The next one is Edward Waters, No. 2.

Dr. Spearman. If you will permit me on Boricua, the answer possibly lies, too, possibly in the fact that one of our initiatives in HEW is to increase our funding levels for our Hispanic population. It clearly fits into that category.

Senator Baucus. Are there any other Hispanic schools?

Dr. Spearman. There are plenty. Several.

Senator Baucus. Why weren't they awarded the money?

Dr. Spearman. For the most part those we had awarded had received the maximum amount available.

For the most part the other Hispanic schools or schools serving heavily populated Hispanic and Indian students had reached a maximum level based on their request for funds.

Senator Baucus. Did they receive 100 percent of their requested funds?

Dr. SPEARMAN. No, sir. I don't know of any schools that for the most part—we had about three schools that received 100 percent.

Senator BAUCUS. If they did not receive 100 percent, they too were competing and could receive more funds?

Dr. SPEARMAN. I suspect that you are right. We could have given more.

Senator BAUCUS. Why single out this one school?

Dr. SPEARMAN. I suspect because of the priority of being located in New York, serving heavy populations of Puerto Rican students. It is a brand new institution attempting to move from a 2- to a 4-year institution. It is consistent with what I thought the Congress intended that this program accomplish: To assist institutions that are struggling and attempting to improve themselves. That institution is moving from a 2-year status to a 4-year status in a period of 4 or 5 years. I thought I exercised fairly good program judgment.

Senator BAUCUS. What about Baker?

Dr. SPEARMAN. I am not sure. I did not recommend Baker. That was a recommendation from our program staff. All I can recall, sir, is it is located in Kansas. I did not intercede personally.

Senator BAUCUS. This is a memo from you to Fred Will.

Dr. SPEARMAN. I am trying to answer based on those that I had a direct personal involvement in.

Senator BAUCUS. There are only six schools here.

Dr. SPEARMAN. Yes. They are some of them that were recommended from a list of 10 to 12 schools by the staff to me. I did not have a part in Baker. The staff recommended it.

Senator BAUCUS. How about Edward Waters?

Dr. SPEARMAN. Edward Waters was increased because we added a $140,000 grant which is an activity to Enterprises for New Directions located in Bethesda, Md., to carry out an activity of identifying exemplary fiscal and administrative programs which were in operation and in order to help Edward Waters strengthen its own administrative and fiscal capability.

Edward Waters College is located in Jacksonville, Fla., and is up for accreditation before the Southern Association this year. That institution has asked the Office of Education to assist them in any way it possibly could to strengthen its capability for meeting the requirements and offering a bona fide accredited education to individuals in postsecondary education.

A staff member of ours, Dr. Sinclair Jetter, was requested by them and is at the institution on a full IPA program. Edward Waters has also written to our staff and to GPMD requesting $50,000 in unexpended funds in order to purchase books for its library.

Finally, Edward Waters had asked for support in improving its own fiscal and administrative capability. We felt that the addition of this activity to Edward Waters would serve to strengthen them in meeting their own capabilities and at the same time have implications for other black schools that were small and private, that needed the same kind of assistance.

Senator BAUCUS. Are there written justifications from you as to why each of these six received additional funding?

Dr. SPEARMAN. There would not be a memo from me on each one of these. I suspect there is written justification in the file on the addition of each one of these schools. Whether that written justification was prepared——

Senator Baucus. I don't want to get too technical here. You selected several of the 10, but not all.

Dr. Spearman. Because the GPMD office——

Senator Baucus. I was wondering why there was no written justification for the six there. According to your own rules, and I will quote again, "Any deviation shall be fully justified in writing and made part of the official file."

My staff went through the file. Maybe justifications were there, but we could not find any.

Dr. Spearman. I heartily concur with you. I expect to see written justification. You asked the question whether I wrote the justification. The answer is no, I did not. I expect the program person who is responsible for each of these institutions to write a justification, and for that justification to appear in the file indicating why each of these six has been recommended for funding.

Senator Baucus. That is true, but this is a memo signed by you. It does not include any justification for selecting these particular schools.

Dr. Spearman. Yes.

Senator Baucus. I would like you to provide the information if it is there.

Dr. Spearman. I would be happy to.

Senator Baucus. When my staff went through the file we could not find any supporting documentation.

Dr. Spearman. I will certainly try to, Senator, and without belaboring the point, a memo was sent to GPMD with more than the five or six schools you have on this list. Through telephone conversation with the Director of the Division of GPMD, we realized on the last day of the funding cycle that it would be impossible, given the heavy load that GPMD had, to process all of the recommendations for additional funding that had been made by the program people.

As such, we were asked to prioritize those we felt were required, and I had to place myself in the position of meeting with the staff and asking of these 10 or 12 institutions, and that should be in the file, a memo to GPMD requesting some 10 to 12 institutions included in this group. I will provide it for the record.

Senator Baucus. You heard the testimony of Fred Will, Dr. Brantley and Dr. Berry. Do you agree generally with the criticism and complaints that have been aired about title III?

Dr. Spearman. Yes, Senator, I agree that there is a very real need for improved management in the title III program.

Senator Baucus. What would your specific recommendations be to remedy those problems? Please be brief because I have to go vote.

Dr. Spearman. In 1 minute, I think that the legislation that Congress is considering for the program will go a long way toward correcting many of the ills that have been inherent in that program. Too, I think an increased number of institutional audits is certainly a prerequisite for improving the program.

Senator Baucus. You also agree that much more documentation and justification is necessary?

Dr. Spearman. Without a doubt.

Senator Baucus. You are the alter ego, as you say, of one of the directors here. Why hasn't there been more documentation in the past?

Dr. Spearman. Sir, we have spent 2 years trying to correct many of the ills that have existed in this program and to try to put funding cycles in a timely manner.

Let me give you an example, this past year we were prepared to make awards to institutions effective June 30. But because of discrepancies between what the Congress expected, in terms of the regulations, and what institutions expected, we had to delay the award cycle for a period of 90 days.

As such, when we say we have placed back in the final days of this period, all of the awards for 300 or 400 awards to be issued to institutions, we had hoped to be able to make these awards as early as June 30. Unfortunately, that was not the case.

Senator Baucus. I want to thank you Dr. Spearman. I might say due to pending floor business, I am going to recess the hearing indefinitely. We will not proceed again today, but we will at some indefinite date in the future. I have questions I would like to ask of several witnesses, and other questions generally with respect to the program.

Thank you.

[Whereupon, at 12:20 p.m., the hearing adjourned, subject to the call of the Chair.]

TITLE III OF THE HIGHER EDUCATION ACT OF 1965

WEDNESDAY, DECEMBER 12, 1979

U.S. SENATE,
SUBCOMMITTEE ON LIMITATIONS OF
CONTRACTED AND DELEGATED AUTHORITY,
COMMITTEE ON THE JUDICIARY,
Washington, D.C.

The subcommittee met, pursuant to notice, in room 1202 Dirksen Senate Office Building, commencing at 9:37 a.m., Hon. Max Baucus (chairman of the subcommittee) presiding.

Present: Senators Baucus and Cochran.

OPENING STATEMENT OF SENATOR BAUCUS

Senator BAUCUS. The hearing will come to order. Today we resume our oversight hearings into title III of the Higher Education Act of 1965, the strengthening developing institutions program. Witnesses who previously have been unable to testify will be afforded an opportunity to do so today. The aim of this hearing is to complete the outline of the shortcomings afflicting this program so that it can be retained and fulfill its intended purpose; that is, aid the poorest and most deserving college students in the country.

Our previous hearing on November 14 revealed a series of specific shortcomings that are hampering this program, including:

Funding decisions which ignore the rules governing such awards;

Alleged favoritism toward certain schools;

An unhealthy series of relationships between the Office of Education, certain schools, and certain assisting agencies;

Alleged manipulation of the program which may involve abuse of Federal funds;

A seeming inability on the part of OE to monitor the way recipient institutions spend their funds;

A seeming inability by HEW to audit this program in an effective manner;

Widespread irregularities which allowed ineligible or unworthy schools to receive grant awards;

Undocumented and unsystematic decisions on the levels of funding;

A lack of accountability for Federal funds by the developing institutions; and

A "revolving door" between officials at the Office of Education and the asisting agencies and developing institutions.

Since 1966 when the program was begun, more than $900 million has been spent by more than 800 institutions. Yet the program is beset by serious problems which I have outlined above. It is not the aim of these hearings to destroy the program. In fact I think the program is a good one; it's meritorious. Rather, we are specifically aiming for substantive changes in the law governing this program that will prevent these and other related evils that have occurred in the past from ever recurring in the future.

There is a good possibility that some of the situations uncovered by this investigation will be forwarded to the Justice Department, accompanied by a request for closer examination of possible civil and/or criminal remedies.

This investigation was begun as part of the ongoing evaluation by the subcommittee of the relationship between the Justice Department and the agencies it serves. That is the backdrop against which this oversight hearing is held.

Our first witness this morning will be Dr. Edward J. Brantley, Director, Division of Institutional Development. Would you come to the witness table, please. I appreciate your being here this morning, Dr. Brantley.

Would you raise your right hand. Do you solemnly swear to tell the truth, the whole truth, and nothing but the truth?

Dr. BRANTLEY. I do.

Senator BAUCUS. Thank you.

Please be seated, Doctor.

SWORN STATEMENT OF EDWARD J. BRANTLEY, DIRECTOR, DIVISION OF INSTITUTIONAL DEVELOPMENT, HEW

Senator BAUCUS. This is a big room, Dr. Brantley, so would you, and everyone else as he or she testifies, pull the microphone up close and speak out so we all are able to hear you. It would be very helpful. I want to thank you for coming today, particularly on such short notice.

I have several questions I want to ask that were not fully covered in the November 14 hearing.

I first have a memo to the file from you dated December 6, 1979. Are you familiar with that memo?

Dr. BRANTLEY. Yes.

[See memorandum on following pages.]

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. [illegible]

Memo to the file

RECAPITULATION(FY '79) - IMPROVE FY '80

The Grant Award Process

I. The granting of awards must be improved if the administration of the program is to improve. Too many people are involved in the review process at the Bureau level after the division has ranked institutions and awarded grants based upon readers and staff evaluations. Too many opinions are used as the bases for changing grants instead of a plan which would be fair and for all institutions.

II. The procedure of review by the Associate Deputy Commissioner and his staff should be shortened. This will assist in making the awards in a timely manner and meet established deadlines. It should not be necessary for Dr. Spearman to review each award. During the 1979 award cycle review, the majority of the changes which he made were not justifind in writing and signed by Dr. Spearman.

III. When Dr. Spearman and Dr. Moye' change a grant during their review process, this should be done on the basis of reading the proposal, or a written critique provided by his staff or a member of the divisional staff. This was not done in the majority of cases during 1979. Grants were changed by Dr. Spearman and Dr. Moye without knowledge of the proposal and without any approved consistent plan.

IV. Discuss with Dr. Moye the procedures of changing awards used by Dr. Spearman and his staff and ascertain if Dr. Moye is aware of these procedures and if he approves. Dr. Spearman informs the divisional staff that he is acting in the stead of Dr. Moye and that he will discuss all aspects of his procedures with Dr. Moye inorder to get a sign-off by Dr. Moye. Since the divisional staff is not a part of every meeting that Dr. Spearman has with Dr. Moye about the grant awards, as divisional director, I am not sure of Dr. Moye's awareness relative to the procedures and changes made by Dr. Spearman. However he should be since Dr. Spearman is a member of his staff.

V. The changes made by Dr. Spearman and Dr. Moye' should be documented in writing, signed and dated if the divisional staff is to be protected from charges of tampering with awards and incomplete and ineffective staff work. We should continue for FY '80 the same procedure required of staff during FY '79 of documenting, dating, and signing any changes made after the original work has been placed in a file.

VI. For FY '79, it will be impossible to know all of the changes made after the original ranking of the institutions and the original awards granted based on the plan of funding used by the division unless the notes taken by John Risen Jones and Morris Brown or the other staff members were retained. Without these notes it will be difficult to document that the changes were made at the bureau level rather than at the divisional level.
A. A form should be developed at the Bureau or divisional level so that consistency of documentation and record keeping will prevail.

2. Improve FY '80 - Memo to the File

VII. It was not sound program practice to give to each Black Institution for FY '79 at least the same amount of award as it received in FY '78. The presidential initiative for Black institutions could have been met if the total amount to the total group had been the same as it was in FY '78. This was the recommendation of the division to keep the total for the group the same but to judge each proposal on its merit. Dr. Spearman's directive to the divisional director and his staff to make the changes so that no less than the amount from the previous year should go to the Black institutions should be reviewed and evaluated before the 1980 grant cycle. Dr. Spearman indicated that the original directive was given to him by Dr. Berry, consequently, Dr. Moye' will probably desire to give the leadership for this review.

VIII. If there are anticipated problems and discretionary positions that exist at the Bureau level, these factors should be provided the Divisional director prior to the formulation of the awards. Data could then be provided the Deputy Director and members of his staff so that the best judgements can be rendered. Then problems such as those which arose with the College of St. Joseph the Provider, University of Dubuque and Northeast Mississippi Junior College can be minimized or eliminated.

IX. Too much time was used by the Associate Deputy Commissioner in reviewing the recommendations made to him from the division for the allocation of funds remaining after the original slates were approved. Consequently, it seems as if it was the ineffective work of the division that caused the total appropriation for FY '79 not to be obligated. The cause of the problem began and remained at the Bureau level. The cause of the problem was the result of the slowness of review by Dr. Spearman. The same slowness which he exemplified during the review of the total slate. The recommendations were submitted to Dr. Spearman on September 19, 1979 and the final approved list was signed by Dr. Spearman on September 28, 1979. The list approved by Dr. Spearman was considerably changed from the original list submitted to him by the division. The list of September 19 from the division listed 19 institutions with the amount of $1,125,322. The allocation of this amount, $1,125,322 would have allocated all of the remaining funds for FY '79 not allocated. The list finally signed by Dr. Spearman listed six institutions in the amount of $691,322.00.

The recommendations from the division had been made on the basis of a study that was made by Dr. Albright for Dr. Moye which showed that there were 24 four-year institutions that received smaller FY 79 single year awards than they received in FY '78. Within the division we proposed the use of the additional funds to correct this situation to the extent to which the funds would permit. Only two of the institutions finally approved by Dr. Spearman fell into the category of the divisional recommendations. These institutions were Freed-Hardeman and Baker-Haskell. The other four institutions were placed on the list from other perspectives developed by Dr. Spearman and others at the Bureau level. These institutions were Edward Waters, Roosevelt, and Medgar Evers. The sixth institution was a two-year institution, Boricua and it was added to increase the amount given to Hispanic institutions.

X. The division did not receive from GPMD a notification of the amount of balance resulting from grant negotiations until September 25,1979.. The amount that remained was $1,330,149. As of September 26, 1979, GPMD would not accept from the division any addition recommendations for award allocations. Consequently, the lateness of the notification and the closing of the period for accepting additional allocations which could be placed in the computer negated the possibility of the division granting the balance of the negotiated fund balance. This problem of the balance must be shared by the division as well as GPMD. If the negotiation had been a shared responsibility between GPMD and the TITLE III division, the large balance would not have existed. However, if the division and Bureau had not been late in getting the grant award documents to GPMD there would have existed more time for the negotiation period. The process for making awards for TITLE III must be improved for FY '80. The recommendations listed in this memo will assist in that improvement. However, cooperation must be received from the Bureau level on the part of Drs. Moye' and Spearman.

December 6, 1979
Edward J Brantley

Senator Baucus. In the first paragraph you state, and I quote: "Too many opinions are used as the basis for changing grants instead of a plan which would be fair."

I wonder if you could explain what you mean by that. Do you mean to say that changes in grant awards were made without a specific plan?

Dr. Brantley. Yes; that is true, Senator. In this particular program many of the times when decisions are made relative to the granting or award during the past year, there was no plan that I saw determined specifically that that particular judgment, that any plan, was the basis for that judgment.

Senator Baucus. You say "no plan"—are you saying there was no guideline as such?

Dr. Brantley. No; I am saying that in making the awards this year the Division had a plan for awarding of grants, but during the course of all of the decisions that were made there were times, once the slates or the recommendations had been sent from our Division to the Bureau, there was no specific plan for making that final determination.

Senator Baucus. That is, there was no plan for procedure to be followed should changes be made?

Dr. Brantley. That's right.

Senator Baucus. And you made the recommendation, as this memo states, that there should be some plan.

Dr. Brantley. There definitely should be a plan if we are going to have fairness for all of the grant awardees that send in materials or proposals to the program.

Senator Baucus. What was the reaction to your suggestion that there be a plan for these occasions?

Dr. Brantley. Well, at the time——

Senator Baucus. First, this memo is dated December 6.

Dr. Brantley. That particular dating of that memo, that particular memo was a relook at the procedures which had taken place and I had put it into the file prior to December 6, but I dated it once the lady brought it over to me, she had it as of December 6 as my memo.

Senator Baucus. But you made the recommendation earlier; is that correct?

Dr. Brantley. That is correct.

Senator Baucus. When was that? How many times, and when in the past have you suggested to your superiors that there be a plan for changing funding levels?

Dr. Brantley. Well, there was a plan. There was a plan that the Division submitted to the Bureau and there was a plan that the Division used in making its decisions about the funding. After we make our recommendations we send our recommendations to the Bureau level. We send the recommendations to Dr. Spearman and Dr. Moye.

At that point they are in charge of our recommendations. At that point was when changes were made in the funding levels for the institutions.

What I am saying is at that particular time I saw no plan, no consistent plan being used at that level to make any changes.

Senator Baucus. Just to set things straight, you are Director of the Division of Institutional Development?

Dr. BRANTLEY. Yes.

Senator BAUCUS. It is your job, for you and your staff, to read and evaluate proposals received from these various institutions?

Dr. BRANTLEY. That's true, sir.

Senator BAUCUS. And your staff is responsible for selecting the institutions and making funding recommendations?

Dr. BRANTLEY. This is correct.

Senator BAUCUS. OK. And you are saying that after you did all that, there was an insufficient plan——

Dr. BRANTLEY. Yes; that's correct.

Senator BAUCUS [continuing]. From then on, that is, between the time you made recommendations and when your superiors made changes?

Dr. BRANTLEY. That is the point that I am saying that there is too much changing and interference with the process.

Senator BAUCUS. Was the first slate you sent up for fiscal 1979 based on any plan at all?

Dr. BRANTLEY. Yes; it was.

Senator BAUCUS. Could you describe that, please.

Dr. BRANTLEY. Our plan was to take the recommendations of the readers and the recommendations of the staff and to reduce those recommendations to a 1-year level, because the readers and the staff persons could recommend anywhere from 1 to 5 years. So to have a base figure, we reduced the funding levels to 1 year and we averaged the recommendations of the staff and the readers and used that as the base figure.

Then if we wanted to have 2 years then that figure was multiplied by 2, or 3, to give you your desired multiyear funding.

Senator BAUCUS. Let's take the 1979 slate. You sent the slate up to Dr. Spearman for review?

Dr. BRANTLEY. That's correct.

Senator BAUCUS. And what happened then? How many changes did he make, and can you give me a general feeling of what happened next?

Dr. BRANTLEY. Once we sent this slate up to Dr. Spearman and Dr. Moye, at that point I would say somewhere between 100 or 175 changes were made in the 2- and 4-year slates.

Senator BAUCUS. So there were somewhere between 100 and 175 changes?

Dr. BRANTLEY. Yes, sir.

Senator BAUCUS. That is out of how many proposals?

Dr. BRANTLEY. About 400 grants.

Senator BAUCUS. About 400?

Dr. BRANTLEY. About 400, yes. At that time we had about 400 or 401 grants.

Senator BAUCUS. That is about a third of them.

Dr. BRANTLEY. Yes.

Senator BAUCUS. Approximately.

Dr. BRANTLEY. Yes, about.

Senator BAUCUS. Can you describe these changes? How many of them were substantive, how many were technical mathematical changes? I am trying to get a flavor of the kinds of changes made.

Dr. BRANTLEY. I would like to describe the process that we went through. I assume that this is the discretionary power of the deputy, so what he did I guess it was his discretion to do it. But in that discretion we would sit around the table and go down one institution after another, one by one, and we covered all of them, and we would be directed during that meeting to make a change to a particular institutional funding.

In other words, if an institution was funded for $100,000, it's very possible that Dr. Spearman would direct us to make a change to $107,000 or $115,000. But here I am saying that we had no plan before us as a guide to be doing this.

Senator Baucus. All right. What you are saying is that you were at the meetings with Dr. Spearman and Dr. Moye and there would be some others present?

Dr. Brantley. Yes.

Senator Baucus. Am I correct in understanding that you were told what changes were to be made?

Dr. Brantley. Yes.

Senator Baucus. Did you discuss it, or did they ask your opinion, and then direct changes? Was this a group effort, in other words, a team effort, or were you just told to make these changes?

Dr. Brantley. I would not say it was any committee effort going on at that time. I would say that we were directed to make changes because we had made our recommendations to the deputy at the time we sent the slate up already. That was our best judgment.

Senator Baucus. So you were—excuse me. Go ahead.

Dr. Brantley. And at the time that we sent the slate up to Dr. Moye and to Dr. Spearman then they were in control of the slate from that point. We were not in control of the slate. During the meetings, they were the ones who would chair the meetings, and during those meetings we were directed as to what to do.

Senator Baucus. Did they ask your opinion or ask for your advice at that time?

Dr. Brantley. At times during those meetings we would be asked for our advice.

Senator Baucus. Out of the 175 changes, how many times were you asked for your opinion or your advice?

Dr. Brantley. I couldn't say, Senator, it wasn't enough to make an impression on me about anything in terms of being intimately involved in making the decisions. So we were not in control of that procedure at that time. We were directed to make these changes.

Senator Baucus. And how many times did they follow your advice the few times that you gave it or were asked for it?

Dr. Brantley. I guess they would follow it if we gave it.

Senator Baucus. At that meeting, among the few times that you were asked for your opinion and gave it, how many times was that advice followed?

Dr. Brantley. I think that they would give consideration to our advice if we gave it during that meeting, but our advice was not sought at that time because this was the period when they, Dr. Moye or Dr. Spearman, were reviewing the slate or our recommendations so they could make their own input into that process.

Senator Baucus. In paragraph 3 of your December 6 memorandum you state, "Grants were changed by Dr. Spearman and Dr. Moye without knowledge of the proposal." Who had access to the proposals?

Dr. Brantley. The staff.

Senator Baucus. So you are saying that Dr. Spearman and Dr. Moye directed these changes without knowledge of the proposals; is that correct?

Dr. Brantley. That's true.

At the time that these changes were being made we did not have the proposals before us. So they were using their knowledge and their judgments based upon figures rather than based on information in the proposals.

Senator Baucus. What knowledge and information did they have if they did not have the proposals?

Dr. Brantley. I can't say. I don't know. They would have to state that, Senator. I don't know what they——

Senator Baucus. The proposals are documents which contain all the information the institutions submitted?

Dr. Brantley. That's correct.

Senator Baucus. These were submitted to your office and contain all the information you have to determine funding amounts for the various institutions?

Dr. Brantley. That's true.

Senator Baucus. Basically, they are the documents involved in the whole process then?

Dr. Brantley. Yes.

Senator Baucus. You are saying that Dr. Spearman and Dr. Moye, to your knowledge, did not have access to or utilize these proposals in making their changes in the slate?

Dr. Brantley. This is true.

Senator Baucus. Do you know whether Dr. Spearman and Dr. Moye reviewed any proposals at all?

Dr. Brantley. I know in a couple of cases we sent proposals up to them.

Senator Baucus. That would be a couple out of 175 or so changes?

Dr. Brantley. Yes. I know we sent three up to them.

Senator Baucus. Three? That would be for fiscal year 1979?

Dr. Brantley. Yes.

Senator Baucus. Could they have possibly, in your judgment, looked at more, or would you have known about it?

Dr. Brantley. I would have probably known about it because a request would have come through my office, or through me or if they had contacted staff, staff would have told me that they wanted certain materials.

Senator Baucus. So what you are saying is that roughly 175 changes were made out of 400. These were changes directed by your superiors, and insofar as you know were not based upon knowledge of the proposals available to you.

Dr. Brantley. I can't say that they were not based upon their knowledge. I can only say that they did not have those proposals before them. I don't know what knowledge they had.

The other thing that bothered me, and it was a major concern to me, Senator, was not so much the discretionary powers which Dr. Spearman and Dr. Moye had—which they do have—but there was nothing put into our files.

Senator **Baucus**. I was going to get to that.

Once the changes were made, was there any written information included in the files indicating the reasons for the changes?

Dr. **Brantley**. No. This is why at the present time we are criticized. The staff is being criticized, and I am being criticized publicly, and in the papers, as changing these things because in our files there is no documentation for the various changes which were made.

So if from the Bureau level we had received documentation to go into our files, anyone now coming to look at our files could tell who made which change and when and it would be dated and so on. We do not have that documentation and that is the thing that concerns me most.

Senator **Baucus**. Did you ask for documentation?

Dr. **Brantley**. No, I did not ask for documentation. This was my first year, and I was working with people who were experienced and I thought that they knew what they were doing.

Senator **Baucus**. Maybe they did. [Laughter.]

Dr. **Brantley**. Our Division has written procedures where we state very specifically to our staff that for any changes they have made they have to document and date it and these were written and given to our staff. So this was common procedure for us in the Division.

Once you go to the Bureau level—well, I have never been impressed in the bureaucracy that a divisional director directs anyone above him to do certain things, so I made the assumption that they knew what they were doing in terms of those matters.

Senator **Baucus**. Let's say somebody from a school received a funding reduction, and calls you up to ask why? What do you tell them?

Dr. **Brantley**. I would say, in terms of the changes to which we are referring at the present time, I could not tell them any particular reason because in order to give an institution a reason you must go to the file and read from that file the justifications provided by the person making the change. So we would not be able; just as people who have looked at our files recently have not been able. We would not be able to say why changes were made. I would not be able to say either. I could only tell from the staff work and what they documented.

Senator **Baucus**. For example, I have a copy of the first page of one of the first 2-year college slates. Are you familiar with that? Staff is now bringing you a copy.

Attached to it are the handwritten notes of Morris Brown.

Dr. **Brantley**. Yes.

[The document referred to follows:]

176
~~175~~ - 1 yr
~~15~~ - 2 yr 46
16 - 3 yr
1 - 4 yr
60
170 tot.
2 for funded
172 tot 7/9/79

222
28 No Recommended
24 " Quality
170 funded
222

172-224 out

M. Braden 5

STRENGTHENING DEVELOPING INSTITUTIONS PROGRAM
Title III, Higher Education Act, as amended

Page 1

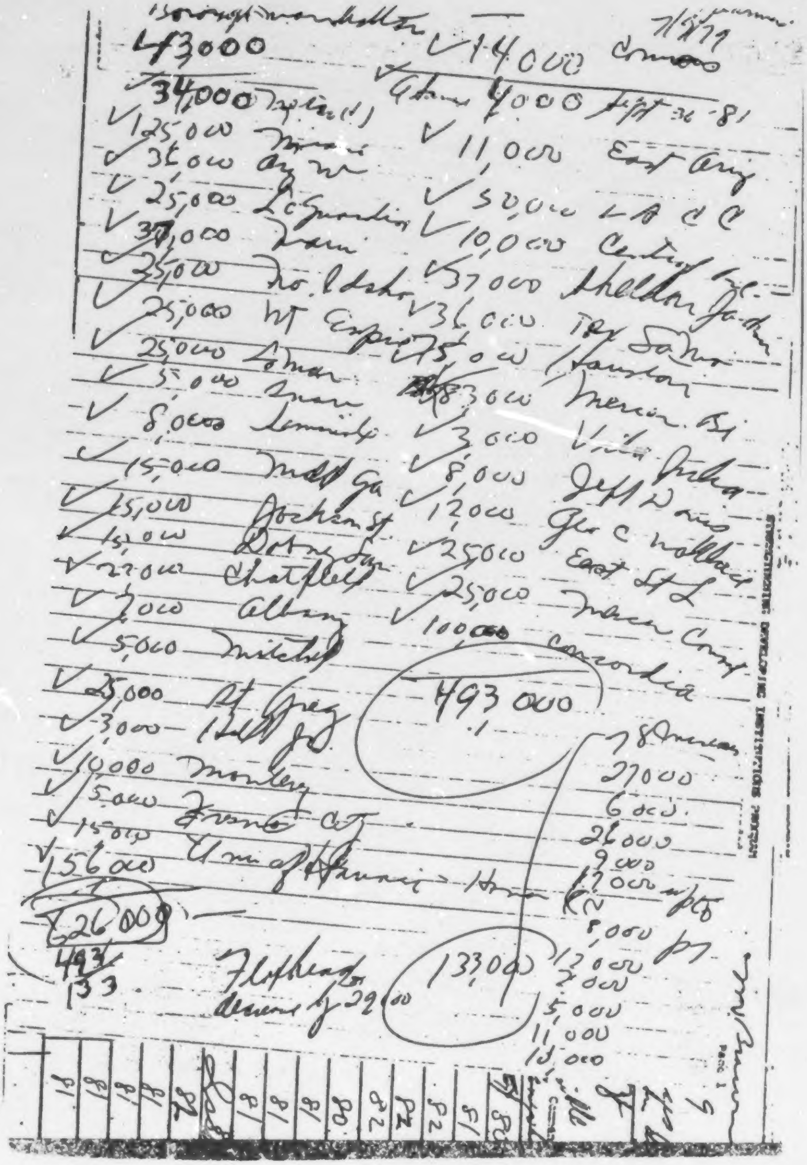
7/2/79

Changes L. Spearman

TWO-YEAR SLATE BASED ON THE ASSIGNED APPROPRIATE NUMBER OF POINTS

Applicant Institution	State	Rank Order	Number of Assigned Points: §169.52 & 853(a): Field Readers	Staff	Appropriate No. of points	Amount Requested	Amount Recommended: Obligations from FY-79 Funds	Total Amount of FY-79 Grants	Amount of FY-1978 Grant	Recommended No. of Years	Ethnic/Racial Enrollments	Comm
Flathead Valley Community College	MT	1	130	161	184	$ 4[illegible],008	~~$381,000~~ 352000	$ ~~381,000~~ 352,000	$ 98,000 15 mos	1	I	FY 8
College of Canado	AZ	2	153	145	176	$ 787,881	$315,000	$ 630,000	$195,000	2	I	81
Yavapai College	AZ	3.5	134	154	174	$1,353,242	$435,000	$1,306,000	$172,000	3	I	82
Laredo Junior College	TX	3.5	165	127	174	$1,413,804	$289,000	$ 866,000	$268,000	3	S	82
Northwest Mississippi Junior College	MS	5.5	165	138	172	$2,087,773	$239,000	$ 717,000	0	3	W	82
Miles Community College	MT	5.5	155	142	172	$ 166,062	$171,000	$ 171,000	0	1	I	80
Roanoke-Chowan Technical Institute	NC	7	143	147	170	$ 569,331	$174,000	$ 347,000	$ 75,000	2	W	81
Southern University Shreveport	LA	8	148	146	167	$1,872,866	$397,000	$ 793,000	$414,000	2	B	81
San Juan College	NM	9	121	143	166	$1,975,133	$193,000	$ 386,000	$ 75,000	2	I	81
Navajo Community College Consortium	AZ	10	158	118	165	$ 734,812	$547,000	$ 547,000	$291,000	1	I	Iss
Borough of Manhattan Community College	NY	12.5	138	143	160	$1,683,409	~~$263,000~~ 250000	$ ~~526,000~~ 750,000	$ 75,000	~~2~~ 3	B	82
Morristown College	TN	12.5	141	149	160	$ 261,197	$100,000	$ 200,000	$ 75,000	2	B	81
Suomi College	MI	12.5	129	145	160	$ 854,201	$190,000	$ 380,000	$ 98,000	2	W	81
Bacone College-Bilateral	OK	12.5	152	121	160	$ 729,954	$190,000	$ 379,000	$146,000	2	I	81
Imperial Valley College	CA	15	147	121	159	$1,471,954	$227,000	$ 454,000	$150,000	2	S	81

3 | 8 | 4 | 1



Borough Manhattan 7/1/79

43000		✓ 14,000	[illegible]
✓ 34,000	Tyler (1)	✓ Adams 4,000	Sept 30 -81
✓ 125,000	Miami	✓ 11,000	East Ariz
✓ 36,000	Ariz W	✓ 50,000	LACC
✓ 25,000	LaGuardia	✓ 10,000	Central
✓ 37,000	[illegible]	✓ 37,000	Sheldon Jackson
✓ 25,000	No. Idaho	✓ 36,000	Tex Southern
✓ 25,000	NT Empire	✓ 75,000	Houston
✓ 25,000	Lamar	83,000	Mercer. Bi
✓ 5,000	[illegible]	✓ 3,000	[illegible]
✓ 8,000	Seminole	✓ 8,000	Jeff Davis
✓ 15,000	Midd Ga	✓ 12,000	Geo C Wallace
✓ 15,000	Jackson St	✓ 25,000	East St L
✓ 15,000	[illegible]	✓ 25,000	Macon Cmty
✓ 22,000	Chatfield	✓ 100,000	Concordia
✓ 7,000	Albany	493,000	
✓ 5,000	Mitchell		
✓ 25,000	St Greg		
✓ 3,000	Hill Jr		
✓ 10,000	Monterey		
✓ 5,000	Fresno CT		
✓ 15,000	U of Hawaii – Hono		
✓ 156,000			
226,000			

493
133

78 American
27000
6000
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12000
2000
5,000
11,000
10,000

133,000

Flathead
29.00

81 81 81 81 82 81 81 80 82 82 82 81

Senator Baucus. For example, Flathead Valley Community College in my home State of Montana is ranked No. 1 among your staff evaluators.

Dr. Brantley. Yes.

Senator Baucus. It apparently was originally awarded $381,000.

Dr. Brantley. This is correct.

Senator Baucus. Did your Division make that original $381,000 recommendation?

Dr. Brantley. We made the original recommendation that's on this record.

Senator Baucus. Yet, on that other memo the $381,000 is crossed out, and instead the sum of $352,000 is written in. At the bottom of Mr. Brown's page of notes is written "Flathead decrease by $29,000."

Who made that change? Do you know?

Dr. Brantley. These were changes recommended to Morris Brown by Dr. Spearman and Dr. Moye.

Senator Baucus. Do you know why that reduction was directed?

Dr. Brantley. No.

Senator Baucus. Do you know whether or not Dr. Spearman read the Flathead proposal?

Dr. Brantley. I don't know if he did read it. No, I do not know if he read it.

Senator Baucus. If he had read it, would you have known about it or could he have read it without your knowledge?

Dr. Brantley. If he had read it, I would probably have known about it because, as I have said, the request would have come through me or through the staff and if it had come through the staff they would have informed me.

Senator Baucus. So that reduction was based upon Dr. Spearman's direction?

Dr. Brantley. That is correct. His direction, and with his authority to do so.

Senator Baucus. And in paragraph 7 of your memo you stated:

> It was not sound program practice to give to each black institution for fiscal 1979 at least the same amount award as it received in fiscal 1978.

Does that mean no black school received less this year than it received last year?

Dr. Brantley. I would say that 99 percent of them received the same level or more this year.

That particular paragraph, and my concern about it, refers to that we were informed by Dr. Spearman that the black institutions were not to receive less than they received the previous year.

Now, our recommendation to him, and this appears in writing, also, was that the institutions should be awarded grants based upon the initiatives which had been established, and the initiative which was established by the Bureau for black institutions was that the black institutions as a group would not receive less than they received last year.

So we were informed that Dr. Berry had informed Dr. Spearman that all of these schools should not receive less than they received last year.

I do not think that that was a sound procedure to use. As a group, I think it would have been fine to give them awards, but I think the institutions should be dealt with based on the merit of the proposals and then you would have more of a sliding scale.

Senator Baucus. Is this policy written anywhere?

Dr. Brantley. Not that particular one. The only policy that—the only notation that we have about it was during the meeting of July 11, I believe was when it was, and Morris Brown wrote it on the top of the funding document and dated it and signed it. So that is the only record that we had about this particular thing other than our knowledge about it.

Senator Baucus. This policy as you understood it was not part of the regulations?

Dr. Brantley. No; it is not part of the regulations.

Senator Baucus. When did the first slate for fiscal year 1979 go from your office to Dr. Spearman and Dr. Moye?

Dr. Brantley. I wouldn't call it a "slate." I would call it the first recommendation.

Senator Baucus. All right, the first recommendation.

Dr. Brantley. That went up during the week of June 18.

Senator Baucus. June 18?

Dr. Brantley. Yes.

Senator Baucus. Dr. Moye is the final person to sign off; isn't he?

Dr. Brantley. Yes, he is.

Senator Baucus. When did he sign off on the amount of funds to go to the various institutions?

Dr. Brantley. As I recall it, the 2-year slate was signed off on around July 20 and the 4-year slate was signed off on July 23. Now, this is not when the final slate was sent because there is a review process for them.

Senator Baucus. When was the final date?

Dr. Brantley. It was about the second week in August up to GPMD.

Senator Baucus. And when the final decision was made, was that with respect to all the schools or were some decided earlier than others? That is, is it conceivable or did it happen that some schools received notice of their awards earlier than other schools?

Dr. Brantley. The notification is not sent from our office. The notification is sent from GPMD and they would call at various times the various institutions. It was—we received information that some of the schools had received copies of the slate and they knew it out in the field. As a matter of fact, one or two of the schools brought copies of the slate to us when they came in to see us. So I guess out in the field some of the institutions did know beforehand.

Senator Baucus. What I am really driving at here is this: Why, in your judgment, was there so much time between the date your office made its recommendation and the date schools knew the amount of funds that they were going to receive? Was there an inordinate period of time there, in your judgment?

Dr. Brantley. In my judgment, and this is my own judgment now——

Senator Baucus. That's all I'm asking.

Dr. Brantley. I think it was too much time. I do not see why it would take that many weeks or more than a month to go through approximately 400 institutions to review them and then to make the recommendations. We should have been finished with these, with each slate sooner than we were, and I believe that a lot of that time was lost in the review process at the Bureau level.

Senator **Baucus**. In paragraph 9 of your memo you state that it was the recommendation of the staff to take the money left after grant negotiations and fund those twenty-four 4-year schools that had received less money in 1979 than they did in 1978.

Yet, you go on to state that only two of those recommendations were followed.

Is that correct?

Dr. **Brantley**. This is true.

Senator **Baucus**. What reasons did Dr. Spearman give you for funding the schools that he did?

Dr. **Brantley**. Well, I guess the best thing I can do is describe the process.

We knew that we had approximately $1.2 million left, so I directed my staff to look at the study which had been done by Dr. Albright for Dr. Moye and in that memo he had indicated that during the funding process a number of institutions—these were predominantly white institutions—had not received the same level of funding that they received last year. I directed Virginia Ré, who was working on this with me, to take the recommendations from Dr. Albright and use that as a basis because as I looked at the four categories of institutions that were predominantly black, or the black institutions, the Hispanic institutions and the Native American institutions, we had tried to put into our funding that initiative for those institutions. The only one that had not been assisted in that way was this last group and in a previous memorandum to the Bureau level we had recommended to them that the extra moneys be used for the three initiatives first, and then if there were additional funds left, that it be used for the fourth.

So when we had this opportunity to make the final recommendations we made it in relation to these institutions.

Senator **Baucus**. All right.

Dr. **Brantley**. Dr. Spearman reviewed it and he directed us to make certain changes which we came back and we did and we sent that back up the next day. I think we went through that procedure for about three or four times, and then finally at the final time I think there were about six institutions recommended for funding, but all of those that were recommended were not a part of the original list that we had sent up.

Senator **Baucus**. You are saying you feel you had better documentation for doing that.

Dr. **Brantley**. That's right, and there was no documentation reason given to us for our files.

Senator **Baucus**. In this case there was no documentation.

Dr. **Brantley**. That's right.

Senator **Baucus**. It is my understanding that you are now on temporary detail?

Dr. **Brantley**. Yes.

Senator **Baucus**. Why were you removed from the Division of Institutional Development?

Dr. **Brantley**. I was informed; I was called in by Dr. Berry and she informed me that based upon the information that she had she felt that—and this information she had received from the Hill—if

I stayed as the Director of the program I would, my presence would, jeopardize the funding of this program.

She also indicated to me that she had been informed that I might be called up before the Appropriations Committee and if I was called up before the Appropriations Committee she felt that I would give the same kind of testimony that I gave during the first hearing which you had and she characterized that testimony as "dismal testimony."

I didn't think it was dismal but that was the way she felt about it.

Senator Baucus. So essentially you are saying that you have been removed because, frankly, by continuing in your position the program would be in jeopardy.

Dr. Brantley. Yes.

Senator Baucus. Dr. Brantley, I want you to know that as far as I personally am concerned, the program is not in jeopardy; that is, I fully support it. But obviously there are continuing problems that must be remedied so the program can be made better and live up to its intended purposes.

As far as I am concerned, I don't think the program is in jeopardy. I will do what I can to keep the program operating because I think it is a worthwhile program.

I have no further questions. Senator Cochran may have some questions at this point.

Senator Cochran.

Senator Cochran. I don't have any questions for this witness, Mr. Chairman.

Thank you very much.

Senator Baucus. Thank you very much, Dr. Brantley, we appreciate your testimony.

Our next witness is Dr. Leonard Spearman, the Associate Deputy Commissioner for Higher and Continuing Education.

Do you solemnly swear to tell the truth, the whole truth and nothing but the truth?

Dr. Spearman. I do.

SWORN STATEMENT OF LEONARD H. O. SPEARMAN, ASSOCIATE DEPUTY COMMISSIONER FOR HIGHER AND CONTINUING EDUCATION, HEW

Senator Baucus. Dr. Spearman, thank you for coming today to testify before this subcommittee.

I know you have a prepared statement, and I will make that part of the record. If you have an abridged version of it that you would like to give at this time, please do so.

Dr. Spearman. No, I would like though to say that on page 10 of that testimony—Senator Baucus, I want to thank you for this opportunity to come back before you.

On page 10 of the testimony I would like to correct a figure, from "$58 million" to say "$68 million."

Senator Baucus. Excuse me, where is that? Page 10? What line?

Dr. Spearman. Well, it would be——

Senator BAUCUS. It is the ninth line, and the figure "$58 million" should be——

Dr. SPEARMAN. Yes; with your permission I would like to change that to $68 million.

Senator BAUCUS. $68 million instead of $58 million.

Dr. SPEARMAN. Yes, right.

On page 11—O, at the third line from the bottom it should be "19" individuals instead of "15."

Senator BAUCUS. All right.

Dr. SPEARMAN. On page 12, the fourth line and fifth line from the bottom where it says "we will normalize scores" change that to "we will adjust scores."

Senator BAUCUS. OK.

Dr. SPEARMAN. Those are the three corrections that I would like to make in the prepared statement.

Senator BAUCUS. With respect to Dr. Brantley's testimony we just heard, one thing that concerns me is the number of changes you and Dr. Moye made and directed Dr. Brantley to make. That is, in his statement he said that between 100 and 175 changes were made in the recommendations from his office; that is, 100 to 175 out of approximately 400. I am concerned with this because at our November 14 hearing in response to my question to you about how many changes were made in dollar amounts you stated, and I quote, "I would roughly say about 10 per year."

Yet, Dr. Brantley says it's in the neighborhood of approximately 150 changes.

Now, the question is: Is it 150 or is it 10?

Dr. SPEARMAN. Senator, I think the apparent honesty of Dr. Brantley with respect to what happens in the slate leaves a great deal to be desired in terms of testimony. The original chart which was presented to my office for review by the members of his staff was replete with errors of all magnitudes. There was absolutely no relationship between previous funding history at institutions and recommendations by our staff; to wit: You mentioned Flathead Valley Community College in your own statement. Flathead Valley Community College received last year, in 1978, $98,000. And the Office of Education cannot make awards until October. We were recommending $375,000 for that institution. The previous history of giving 2-year institutions or any other institutions a considerable amount of money and having them to spend it ends up when the Federal Government at the end of June comes back and says, "You poor guys out there, you don't know how to handle the money, and, therefore, we take it back and we penalize you for next year."

I cite that as an example to say that ofttimes recommendations made on the part of people to my office indicates a complete lack of understanding of institutional behavior.

Senator BAUCUS. We can get into the reasons for changes later in the——

Dr. SPEARMAN. Well, but the answer is if you are raising the question of 10 to 12——

Senator BAUCUS. The question is how many changes were made. You have stated previously that——

Dr. Spearman. But it depends on what you refer to in terms of "changes."

Senator Baucus. Well, I am asking how many changes were made. I am trying to clarify the record on this point.

Dr. Spearman. And I am trying to clarify for you what is meant by a change. Sir, I am not trying to be difficult with this. I am simply stating to you that there are mathematical problems that require changes. Two, there are relationships of recommended funding levels to previous levels that require changes, and——

Senator Baucus. Excuse me, Dr. Spearman, just 1 second.

Dr. Spearman. Yes, sir.

Senator Baucus. One second, please. All I am asking is what was the number of changes. After we determine that, then we will go on to——

Dr. Spearman. I will have to presume that Dr. Brantley's knowledge is correct.

Senator Baucus. Then we will go into the quality of the changes and type of changes made as to——

Dr. Spearman. I have no idea of——

Senator Baucus [continuing]. Whether they were substantive or not. But you said this last November 14 that there were only 10 changes.

Dr. Spearman. That's absolutely correct.

Senator Baucus. Yet Dr. Brantley claims there were 150 changes. Now, regardless of how small they were or what the reasons for the changes were, how many changes did you and Dr. Moye, separately or together, make from the recommendations from Dr. Brantley's office?

Then we can go on to the separate question of the reasons for the changes and the kinds of changes made.

But now, how many changes, however small they might be, were in fact made?

Dr. Spearman. Senator, I am afraid I can't answer that. I am not being difficult. I don't know how many changes were made.

Senator Baucus. I am not trying to be difficult either. I want to be clear though. First you said 10, and now you don't know. So how many were there?

Dr. Spearman. In the context of your asking me that question in the last hearing, I assumed you meant changes, after the slate had gone to GPMD how many changes were recommended, and I said 10 to 12.

This time we are talking about from the beginning of it, that is from June 18 until a slate was delivered to GPMD.

I am answering that my original statement of 10 to 12 still stands if we are talking about changes that may have been made in the recommended slate after the transmittal of that slate from our office; that is from the program office to the Grants Procurement and Management Division for negotiation. But if you raise the question how many changes did I make in the slate during the review process from June 18, which is what Dr. Brantley is using as a reference base, then it could be an inordinate number. Dr. Brantley's statement could be absolutely correct.

Senator BAUCUS. All right.

Dr. SPEARMAN. I have no way of knowing and I am amazed that he knows with such great accuracy.

Senator BAUCUS. All I am asking now is the number of changes you, Dr. Moye, and others may have made.

Dr. SPEARMAN. I am sorry, Senator, I would have to go back and try to go through the slates and reconstruct the number of changes that I made in the slates from June 18 until the time that slate was approved by Dr. Moye and by the Commissioner for transmittal to GPMD.

Senator BAUCUS. How often did you make changes based upon your examination of the proposals?

Dr. SPEARMAN. I would say about three or four times in terms of actually reading proposals.

Senator BAUCUS. And what percentage of the number of institutions would that amount to? That is, among the changes that you made, you say you looked at three or four proposals, what percentage of total changes would that be? Did you look at proposals for all the changes that you made or for half, or 10 percent? What percentage would that be?

Dr. SPEARMAN. Sir, I don't think we have given you a clear explanation of the proposal review process, because I would not have any reason to review the proposals. I would review the recommendations of the staff.

Senator BAUCUS. I am trying to determine when the recommendations came up from Dr. Brantley's shop to you——

Dr. SPEARMAN. That's correct.

Senator BAUCUS. At that point, as you have the recommendations in your office on your desk——

Dr. SPEARMAN. Yes, sir.

Senator BAUCUS. And you are sitting at your desk trying to determine what to do now. How much information did you have in making your next decision? That is, did you have the proposals from Dr. Brantley's office on your desk as you were deciding if changes should be made in these recommendations? Or, did you, in fact, make your changes based upon some other information?

Dr. SPEARMAN. In the proposal process, Mr. Brown and Dr. Brantley come to my office as you described it. They do not bring proposals, sir, they bring a slate with an inordinate number of variables by which they arrive at their decisions.

They don't make recommendations; they ask for counsel regarding the use of the variables that they have identified.

There were more than 18 or 19 variables brought to our office upon which decisions were made or on which they were making recommendations.

I attempted to sort through those variables with them to see which ones are absolutely germane to a recommendation for funding for an institution. It is a joint discussion between the branch chief who prepares the initial program recommendations, the Division Director, and myself. They in turn use whatever information they feel is appropriate and consistent with the law to construct that slate in a manner in which it makes sense to respond to institutions. This involves looking at scores, looking at recommended amounts by field readers, and by staff. I also evaluate the recommendations against initiatives from the Department and from the Office of the Commissioner.

I ask them a series of questions about the slate. One, how many institutions are ineligible to participate in this program? Who determined the eligibility of that institution? If it was determined ineligible, why? Was it in the program the previous year? Are you recommending for continuation of that program? If not, are your justifications solid? How many institutions lost accreditation? How many institutions were grandfathered by Congress extension of the law?

Senator BAUCUS. I understand, and those are all——

Dr. SPEARMAN. But this is a part of the review process. I am not sure that anyone has defined that.

Now, there are on that slate a host of recommendations including money recommendation. The staff discusses funding levels with me, and I respond to those levels by asking about relationships between previous funding history and current recommendations. I look for mathematical errors in the recommendations. I ask what procedures did the staff use to arrive at this figure? I ask who on the staff and what kind of field readers read that proposal? How reliable are they? So when we come up with that slate, you will note that, yes, there is a recommendation for Flathead for $382,000 and I will say to the staff, are you absolutely sure that there is a fundamental relationship between the amount that Flathead received last year which is $98,000, and the $300,000 they are recommended for this year?

If you are not to make the awards until October 1, and the institution is to spend the money by June 30, will the institution be able to absorb it or will you go back ultimately and penalize them for not being able to spend all the money?

I ask why did you choose this institution for a 2-year recommendation as opposed to 1 year?

So I ask a host of questions, and sometimes the responses lead to changes in the recommended amounts. They do not lead to changes in the ranking of individual institutions. They lead only to changes in the recommended amounts.

No. 2, the staff did not make consistent recommendations for Commissioner's discretionary points which is permitted by the regulation. In some instances I have made recommendations for changes in the Commissioner's points, in some instances Dr. Moye made them, in some instances Dr. Brantley made them, in some instances Mr. Brown made them. We made them based on the use of our own professional knowledge regarding institutional behavior and based on the criteria which is published in the Federal Register, which is legal.

Senator BAUCUS. I am a little curious about what you are saying because Dr. Brantley testified with respect to Flathead Valley Community College that he was just told to make the change, that is, he was not asked any questions about it as you are now suggesting was the method of——

Dr. SPEARMAN. Sir, Dr. Brantley will remember on December 6 after he was relieved from responsibilities in that Division and put it in the file so if you—if the credibility of that memo stands over what actually took place and if the appearance of this tyrannical Associate

Deputy Commissioner directing people who sat around the room like puppets and who accepted a $50,000 salary as a senior executive serviceman and took my giving this, it's difficult for me to believe. It is very difficult for me to believe that Dr. Brantley sat in those meetings which took place from June 18 to September 30, and said, "Whatever you say, sir, I'll do it."

Senator BAUCUS. Well, Dr. Spearman——

Dr. SPEARMAN. That's difficult for you to believe, isn't it?

Senator BAUCUS. He testified under oath that that is essentially what happened.

Dr. SPEARMAN. Well, let me assure you that on six occasions Dr. Brantley came to me and said, "I need all of the help you can provide us. This is brand-new for me. I don't understand the process."

Senator BAUCUS. Let's go back to specific schools. I understand there are certain policy questions you have to concern yourself with. Yet when all is said and done there is a specific dollar amount awarded to all these schools.

You can only give a certain number of dollars to a specific school.

Dr. SPEARMAN. That's right.

Senator BAUCUS. That's what it comes down to. So you have to deal with specifics, that is, with specific institutions.

My question is to what degree you used proposals from specific schools.

Dr. SPEARMAN. I said I saw proposals on at least three or four occasions.

Senator BAUCUS. Out of how many changes?

Dr. SPEARMAN. I would have to answer that for the record, sir.

Senator BAUCUS. Well, give us your best recollection.

Dr. SPEARMAN. Because you and I cannot—we don't have a base on which you call "changes." If you were talking about changes from the moment that this slate comes to me from June 18, I can't count them.

Senator BAUCUS. Well, you——

Dr. SPEARMAN. I don't know of anybody in the Office of Education that can tell you how many changes they make or in any program in the Federal bureaucracy that can tell you from June 18 how many changes before it goes to GPMD.

Senator BAUCUS. You can make it on any basis you want to, but define what you mean by "changes."

You said you looked at three or four proposals. I am asking out of how many changes. You can answer that any way you want. I am leaving that to you to answer.

Dr. SPEARMAN. I repeat, I have no idea but I must have made a number of changes. We must have made a number of changes in the recommendations because the recommendations that came from our office required a number of changes.

Senator BAUCUS. So you made a number of changes?

Dr. SPEARMAN. Yes, sir.

Senator BAUCUS. Does that mean 10, 50, 150?

Dr. SPEARMAN. I am awfully sorry, Senator. I am not being disrespectful but my memory is just not as good as Dr. Brantley's.

Senator BAUCUS. You are in charge of the program. At least you must have some sense of it.

Dr. Spearman. Well, when you say "changes," are you talking about changes from the time that slate goes to GPMD or are you saying from June 18?

Senator Baucus. No; from the earlier date. How many changes in dollar amounts did you make among the 400 schools?

Dr. Spearman. A hundred.

Senator Baucus. A hundred?

Dr. Spearman. Yes, sir.

Senator Baucus. Out of that 100, you saw 3 or 4 proposals?

Dr. Spearman. That's correct.

Senator Baucus. You didn't see any more proposals than that?

Dr. Spearman. No; I did not read the proposals.

Senator Baucus. Is there any reason why you didn't?

Dr. Spearman. Sir, that's precisely the reason that the question leads one to perjure himself, sir.

Senator Baucus. It depends on the circumstances, Dr. Spearman.

Dr. Spearman. No, no, no, sir. I keep saying to you and you keep pushing on how many changes I made, and I am saying to you that in my testimony that I presented here that these people bring to me a chart or a slate with an inordinate number of variables. I have to examine the relationship of each of those variables and I ask questions about those variables and their relationship to the funding recommendations.

When that occurs, out here on the end is some kind of number called dollars and I ask: "What is the relationship of that dollar amount to the ranking, to the amount that the institution received last year, and does it jeopardize the institution?" For example, if an institution received $500,000 last year, the staff recommendation came up with $250,000, that is, half the amount. It is August, September, say. The very kinds of institutions that we are dealing with have made commitments to people. There are people on that staff such as presidents who are becoming increasingly anxious. Am I going to say to them in September, "Sir, we are cutting you by $250,000, but you have got five people on your payroll as a result of that?" If I interface and interact with my staff and say, are you absolutely sure that the kinds of institutions that we are dealing with that we can afford to reduce that institution from $300,000 to $150,000 or $500,000 to $250,000 in the middle of the year? What impact will it have on the operation of that institution?

Then I may recommend a change.

Senator Baucus. Let me ask you another question.

Obviously you, as a superior to Dr. Brantley, exercise certain discretion. That is your job. Obviously there are going to be circumstances and times when you disagree with your staff. There had better be or you are not doing your job, and there is no need for you.

Dr. Spearman. I appreciate that.

Senator Baucus. That is in the ideal world, of course.

But I am a little concerned about documentation and the reasons for changes that you as a superior might make or might not make. Certainly when there is a major change in recommendations or a major change in the dollar amount the institution receives 1 year compared with another, it would help create confidence in the program and in institutions and government, if there are documented reasons for the changes that make some sense.

Dr. SPEARMAN. Correct.

Senator BAUCUS. Yet there seems to be virtually no documentation for these changes.

The staff works up several reasons for recommending certain amounts for certain programs and then are told, "No, there should be all these changes." Some of these changes are large, for example, the reduction of half the amount recommended. Let me read you a few of the changes.

One here says, and I don't like to mention names, but it pops out. Florida Memorial College. The first recommendation was for $459,000 but the school received $1,030,000.

Dr. SPEARMAN. What school is this, sir?

Senator BAUCUS. Florida Memorial College. It received an increase of twice the recommendation. There are others of the same magnitude.

Here is one that is three times the recommendation, $400,000 to $1.2 million.

There are many others as you can see from the list you have before you now.

[Text of document referred to follows:]

U.S. SENATE,
COMMITTEE ON THE JUDICIARY,
Washington, D.C.

Re changes in the fiscal year 1979 slate for 4-year schools

Memorandum
To: Chairman Baucus
From: Subcommittee Staff
Date: December 11, 1979

Some of the changes in the fiscal year 1979 slate are illustrated by the following chart:

Institution	1st slate	Actual funding
Florida Memorial College (Florida)	$459,000	$1,030,000
Huston-Tillotson College (Texas)	451,000	1,267,000
LeMoyne Owen College (Tennessee)	679,000	1,029,000
Wilberforce University (Ohio)	421,000	1,058,000
Oakland City College (Indiana)	41,000	123,000
Catholic University of Puerto Rico	0	220,000
St. Mary's College of the Plains (Kansas)	0	89,600
Pembroke State University (North Carolina)	1,275,000	800,000
Bloomfield College (New Jersey)	997,000	288,000
Roosevelt University (Illinois)	350,000	250,000

Senator BAUCUS. These are instances of very significant reductions in amounts. Yet there were no written reasons for the changes. I am curious why we don't have documentation for changes that you arguably, in exercising your discretion as a manager and superior, are entitled to make and probably in your province should make occasionally. Why is there no documentation?

Dr. SPEARMAN. I agree with you, Senator, completely on that where there is an absence, in many instances, no justification, for changes that take place in awards. That is why it's important, that's why what I tried to say previously it is important in terms of timing of that justification and when it goes to GPMD for negotiation, and I agree with you that we ought not send any kind of recommendation to the grants office that requires a substantial change in the amount of awards that are given to an institution without proper justification.

Sir, I——

Senator Baucus. Do you think——

Dr. Spearman. I agree with you. That's the point. But we are talking about that point at which my staff comes to me to discuss funding recommendations, at which time there is exchange between us regarding the criteria that they use and so forth before the degree to which they have followed the instructions, the degree to which they are in agreement with the fundings situation. I don't know why justification is needed in a conversation about an institution, but when you send it from our office to the next office for negotiation I could not be more in agreement with you that we ought to improve our ability to support any fundamental changes in institutional behavior with proper justification. Yes; I do agree with you.

Senator Baucus. Why haven't you?

Dr. Spearman. Why haven't I? With 170 changes during discussions on technical problems?

Senator Baucus. Well, technical or substantive, either one, why haven't you provided that documentation?

Dr. Spearman. Well, I suspect that——

Senator Baucus. You agreed it should be done. I am curious as to why it hasn't been done.

Dr. Spearman. I suspect that if—sir, we will move to try to improve that. I assure you.

These hearings will increase our sensitivity and make us all aware of the fact that in the future we will document those changes.

Senator Baucus. Do you receive any inquiries from offended institutions; that is, from colleges whose funding was cut and wondered why? Do you receive phone calls or letters or bump into people on the street who ask you about this?

Dr. Spearman. Yes; Senator, I have received——

Senator Baucus. What do you tell them when you talk with them?

Dr. Spearman. What do I tell who?

Senator Baucus. Well, whoever calls you up and asks you why their funding has been cut?

Dr. Spearman. It depends on what happened to that institution. I go back and ask the staff who are responsible for the direct implementation of the program to give me an explanation of why that institution received more or less money.

Senator Baucus. But when you make the change, and there is no documentation——

Dr. Spearman. Let me correct something.

Dr. Brantley testified to you a moment ago that when we discovered—it was Dr. Brantley who discovered this, incidentally, and reported it—that we had $1.2 million to $1.3 million unobligated, he did meet with me, that is correct. I did express alarm at the staff for severely underestimating a program in which the Appropriations Committee had cut $10 million for the 1980 coming fiscal year. And I said to them:

> I am embarrassed that we may have to give back to the Congress or to the Treasury this $1.2 million in a program in which $500 million has been requested

and with the kinds of institutions that have requested these funds. This is indeed an abysmal performance on our part to allow this. What institutions did we seriously underrepresent.

And so forth.

Dr. Brantley in collaboration with his staff returned with a list of some of the institutions on that list as a result of intervention from my office and from other offices of some 14 or 15 schools. We forwarded that list to Mr. Will on September 26 with Dr. Moye's signature and it stated that funding documentation for each of the approved increases will be transmitted to your office tomorrow.

Loretta Warzyniak transmitted that information to GPMD to Mr. Arthur Stewart the following day, and we have a signed statement indicating that that justification was transmitted.

So on those institutions in which there was intervention on my part during the last days of that funding cycle, funding justification was forwarded to the Grants Management and Procurement Division.

Senator BAUCUS. I am sorry, I am afraid we will have to recess the hearings. We have a vote going on. It is my understanding there will be another vote at 11 o'clock, so we will recess the hearing for approximately 20 minutes.

[Brief recess.]

Senator BAUCUS. The hearing will come to order.

Dr. Spearman, there are two basic points I want to make. First a point of clarification. Dr. Brantley mentioned his disagreement with what he perceived as a policy to grant black institutions this year the same amount of money or more than the amount they received last year. Only a few black institutions received less. It's my understanding that the intent of the legislation was to help developing institutions, all institutions that are in that "developing" category and need help. Certainly some black institutions fall within that category. It is also my understanding, however, that other institutions, in addition to the black ones, qualify under the general intent of Congress and should receive funds. Certainly they should not be put in a less favorable position compared to other developing institutions.

For example, some institutions might be isolated because of their rural setting, while others might serve a different minority group. What is your understanding of OE policy with respect to this question?

Second, what policy do you think is proper in this regard?

Dr. SPEARMAN. Thank you very much, Senator Baucus. I firmly believe that when there are administrative initiatives prior established by an administration for a select group or to identify a select group, that these initiatives might well be identified sufficiently early so that the appropriate changes in regulation and funding criteria can be made to assure avoidance of the kind of chaos which may result if you announce an administrative initiative during the funding process which can be caused.

I think all of us are aware of the fact that this program has a history which is tied inextricably to black colleges. The Conference Report itself in 1965 outlined that fact. Congressman Green stated that we drafted this piece of legislation on the Hill in order to assist the Negro colleges of the South, caught in the aftermath of the Civil Rights Act of 1964, a time in which black colleges in the South were threatened with possible loss through desegregation of their faculty and students.

As you well know, between 1965, the inception of the program, and today, there are far more than only black institutions in the program. In 1972, the administration at that time sought to increase the number of Spanish or Hispanic-oriented institutions that participated in that program. On January 17, 1979, the President of the United States issued a—well, I suspect a memorandum is the appropriate word—in which he expressed concern about the future of the historical black colleges and asked all administrative officials to concern themselves with addressing problems related to them. As such, for any review of the title III slate which took place, we in the Office of Education raised questions about the funding level for black colleges on that slate. We also raised questions about the funding level for Hispanic institutions and for institutions serving the native American students.

I would submit to you that, and I would hope, that initiatives which are addressed to changes or which have an impact on funding recommendations for colleges be published sufficiently early so that (1) the Congress of the United States, and (2) the general constituency which we represent would have an opportunity to react to the initiative. I think it would insure fairness, it would insure open and public information to all institutions regarding what we do. That is my answer to what I think about it.

Senator BAUCUS. My questions is though, has it been the policy of the developing institutions program to allocate the same amount of dollars to black institutions as they received last year? Has that been the policy?

Dr. SPEARMAN. I suspect the response to whether it's been the policy or whether it's been the behavior, the answer is that it has been the behavior. Historically the black colleges were the earliest to participate in the program.

Senator BAUCUS. I am talking about last year. This last slate.

Dr. SPEARMAN. Has it been the policy to see that they got more money?

Senator BAUCUS. That no black institution received fewer dollars.

Dr. SPEARMAN. I suspect that what we had was a discussion of the President's initiative for addressing black colleges and that we raised the question whether black colleges were receiving a sharp drop in the amount of the funds at a time when we were aware that all Federal agencies were being—all Federal agencies were trying to implement activities which would sharply increase the amount of resources to black colleges.

So it is very possible that the Office of Education interpreted that to mean that black colleges should not receive less money than they had received a year ago.

Senator BAUCUS. You say that is what you perceived to be the policy. Is that written down anywhere?

Dr. SPEARMAN. No. On September 24 in a memorandum to Assistant Secretary Berry we discuss the need to—pardon me. Let me say that in a July 31 memo from the Executive Deputy Commissioner for Resources and Operations to Dr. Moye, Mr. Pickman stated:

> As you know, on January 27 the President directed all executive departments and agencies to strengthen their support to black colleges and universities. In accordance with this directive we conducted thorough review to see if black

institutions have adequately participated in these programs. The review revealed that many of OE programs provided funds to black colleges, however, some programs showed occasions of insufficient participation from black schools, and so forth.

I would be happy to provide you with a copy of this.

In essence it says specific steps could involve—that is, involving black colleges—initiating a review operation to see if black institutions are being given a fair opportunity to participate in it—the BHCE, the Bureau of Higher and Continuing Education contract and grant programs; develop an affirmative effort to inform black institutions how to apply and compete for grants and contracts offering technical assistance to institutional representatives to help them improve the quality of these grants and contracts; identifying small research contracts and/or grants that would be let without competition through a sole-source mechanism; establish a forum with black institutions for continuing consultational program participation; planning visits and other efforts to familiarize OE staff with the unique and indispensable resources of these applicants. I would assume the answer is that clearly this memorandum indicates that we have a policy, for example, in the role that OE plays with respect to black institutions.

[Text of memorandum of July 31 referred to follows:]

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION

DATE: JUL 3 1 1979

TO : Alfred L. Moyé
Deputy Commissioner, BHCE

FROM : Executive Deputy Commissioner
for Resources and Operations

SUBJECT Black College Initiative

As you know, on January 27, 1979 the President directed all Executive Departments and Agencies to strengthen their support to black colleges and universities. In accordance with this Directive, OE conducted a thorough review to see if black institutions were adequately participating in OE programs.

The review revealed that many of OE's programs are providing funds to black colleges. However, some programs showed indications of insufficient participation from black schools. For example, several of the BHCE programs will either decrease or provide no allocations to black institutions in FY 79 and 80. These programs include:

Program	FY 1979 Total Obligation to Historically Black Colleges	Estimated	
		1979	1980
Strengthening Developing Institutions	$53,027,854	$54,272,434	$47,721,824
Group Projects Abroad for Non-Western Language and Area Studies	149,999	45,000	45,000
Domestic Mining and Minerals and Mineral Fuel Conservation Fellowships	---	---	---
Annual Interest Grant Program	449,334	401,150	401,150
Education for Public Services	96,595	24,827	24,827

It is important that the Bureau make an effort to improve the funding pattern for these programs. Please carefully review the areas listed above and prepare specific steps that can be taken to give black institutions better opportunitiss to receive BHCE assistance. Specific steps could involve:

- o Initiating a review of operations to see if black institutions are being given a fair opportunity to participate in BHCE contract and grant programs;
- o Developing an affirmative effort to inform black institutions how to apply and compete for grants and contracts; offering technical assistance to institutional representatives to help them improve the quality of these grant and contract proposals;
- o Identifying small research contracts and/or grants that can be let without competition through a Sole-Source mechanism;
- o Establishing a forum with black institutions for continuing consultation on program participation; and
- o Planning visits and other efforts to familiarize OE staff with the unique and indispensable resources of the black colleges.

Each proposal should contain clearly defined actions; a timetable; and the amount of increased support that will be needed to implement your actions. However, if the FY 79 and 80 projections are completely justifiable, an explanation to that effect may be given.

Please provide me with this information by August 15. Thank you for your cooperation.

James Pickman

cc: Mary Berry
John Ellis

Senator **BAUCUS**. Dr. Spearman, it is my view that all institutions should be treated similarly. That is an expression used commonly with respect to the 14th amendment and I think it should apply in this case, too. Whether the school is black or not is really not relevant. Rather the question should be does this particular applicant qualify as a developing institution?

Certainly many black colleges do qualify, as do other colleges. It would be my hope that as this program is applied in the future that in fact we are more color blind.

The other point I want to make is this, and I don't want to prolong this part of the hearing, I fully appreciate that, as I mentioned earlier, any manager should exercise his discretion in running a program. I am not here to determine whether you or Dr. Brantley is correct in the statements you are making, in the areas where you disagree. That's not my function.

Frankly, I don't like to get into those kinds of things.

Dr. **SPEARMAN**. I agree.

Senator **BAUCUS**. Nevertheless, it's my feeling, and you by and large agree with it as you have said, that there can be better documentation for changes in staff recommendations. It would be my hope that in the future, regardless of who holds these positions, regulations and guidelines are developed to insure there is sufficient information and documentation when changes are made in which schools get funded and how much money they receive.

All of this is going to help the program. It's going to strengthen confidence in the program, and help Congress to decide whether or not we are wasting the taxpayers' dollars. I don't take this oversight function lightly. I think it's an overworked plea that I am making now but I think it is one that most people in America feel, that when people pay taxes we ought to make sure the dollars are spent fairly, properly, and efficiently.

It seems to me you need more and better documentation. As I understand the program now, there is virtually no documentation of changes. If there is more, we in the Congress will be in a better position to determine whether or not the program is wasteful.

If it is not wasteful it's going to have much more support. If it is wasteful, obviously less support will be forthcoming.

Dr. **SPEARMAN**. That's right, less support.

Senator **BAUCUS**. The less we know, the less inclined we in the Congress are going to be to support the program.

On the face of it, I think the program is very good and deserving, but as I said before it has many problems. It is my hope that in the future these problems will be taken care of.

It is also my thought that if this subcommittee does not return to review the program—although we may—other subcommittees in the future will come back to see whether all the good words such as "we will do a better job" do in fact come to pass. Words are nice, but action is better.

Dr. **SPEARMAN**. That's right.

Senator **BAUCUS**. And we or someone else will return, I know, in the next months and years to look at the program and see whether all the good intentions we have heard about in the last 2 days of hearings in fact come to pass.

I have no more questions of Dr. Spearman.

Senator Cochran, do you have any questions?

Senator **Cochran**. I was interested, Mr. Chairman, in asking the witness about the procedures that were described in approving the final figure for a grant.

You mentioned going over the various variables, I think is what you said, which ought to be considered in the review of the slate. I guess the question I want to ask is, shouldn't this be something that occurs before the slate ever gets to your personal attention? Shouldn't the staff check these variables, compare the total allocation of funds with the amount of the appropriation that you have to work with so that you will have a benefit of that kind of preliminary work before you review the recommendations?

Dr. **Spearman**. Yes, sir. I quite agree with you. I do apologize to the committee because I think—I agree with you that to attempt to make the decision here as to who is right and who's wrong defeats the total purpose of the hearing.

Senator **Cochran**. But I presume this is one of the changes being made by the Office of Education.

Dr. **Spearman**. What we are interested in is the same thing you are interested in. We are interested in assuring that the people who pay taxes in this country, and the institutions that are represented here, do get the most equitable treatment that is possible.

When you look at the events that took place prior to the 1978 funding cycle, and when you look at the GAO report which really said that we needed to improve management of this program, we needed to improve the field reader selection and improve all the kinds of things that we in essence in our response to the GAO report indicate we agree on. Our sensitivity is up and if it appeared to the members of the subcommittee, Senator Cochran, that we are trying to sit here and play God, we are not. We are trying with the sincerest efforts that we can to say, "Look, folks, we can't afford to be criticized by the American people for being unfair."

Sometimes in the haste of waiting for all this decisionmaking until the last minute, trying to make 404 awards, to assist GPMD to get 404 awards out in 30 days to institutions in a process which is already several months late, some of our intentions may appear to be unfounded, may appear to be unwarranted, but certainly these are not errors of intentional mistreatment of institutions.

Second, when one has a staff that sometimes many of the people on our staff have never taught in an institution, they have never occupied an administrative responsibility in the institutions, faculty positions and so on; and I could only hope that while it may appear to be an arbitrary and capricious decision that you are trying to interact to say what is the real life inside of an institution? So when that process is not clarified well for me, it involves more involvement in the decisionmaking than I would like to have and the answer is yes; I would like to have less involvement in those decisions than I would have liked it last year.

Senator **Cochran**. But I think this is the point that needed to be made for the purposes of the record, to offer some balance at this point.

I have no other questions of the witness, Mr. Chairman.

I would like either at this point or whatever the pleasure of the Chair is, or at some point during the progress of the hearing, to incorporate in the record statements that have been sent to me by various educators, people involved in this title III program in one way or another, which I think should be made a part of the record.

Could I do that now?

Senator BAUCUS. Without objection, certainly.

Senator COCHRAN. Then we can proceed to other witnesses. Among the statements, and I will submit these to the reporter for the record, and I would ask unanimous consent that they all be made a part of the record.

Senator BAUCUS. Without objection.

Senator COCHRAN. These are from presidents of recipient universities and colleges such as Talladega, identifying the use of funds, some of the assisting agencies which have been particularly helpful to them:

Tuskegee is another,

Livingston College in North Carolina,

Landra Smith in Little Rock, Ark.,

The president of Voorhees College, in South Carolina,

Spellman College in Atlanta, Ga.,

Knoxville College, in Tennessee,

From the president of Xavier University in Louisiana,

Also there is a statement here, Mr. Chairman, from the executive director of the Technical Assistance Consortium to Improve College Services, an agency that has been referred to particularly in the earlier hearing.

And also a detailed statement from the Director of Government Affairs for the United Negro College Fund here in Washington, D.C.

All of which I ask be made a part of the record.

Senator BAUCUS. Without objection.

Senator BAUCUS. In reference to what the Senator from Mississippi has just included in the record, I would hope the Senator from Mississippi would also agree that though the program is a meritorious one—as this Senator certainly believes—there are problems with the program that should be cleared up. I don't have a long list of letters that support this to enter into the record, mostly because my State of Montana doesn't have that many developing insitutions.

Senator COCHRAN. Well, none of those were from Mississippi you will notice. We have some outstanding recipients though.

Senator BAUCUS. I would expect the Senator from Mississippi to also believe there are problems with the program that should be cleared up. We know the program provides money to deserving institutions, and that the Office of Education could probably improve upon and make this program more efficient.

Senator COCHRAN. There is no question that we can always improve every Government program, but I think this hearing ought to be balanced with information that is available and has been submitted to the committee.

Senator BAUCUS. Dr. Spearman, I thank you very much for your testimony.

Dr. SPEARMAN. Thank you.

[The prepared statement of Mr. Spearman follows:]

PREPARED STATEMENT OF DR. LEONARD H. O. SPEARMAN

I wish to thank the chairman for this opportunity to enter a statement into the official hearing of this subcommittee on the strengthening developing institutions program, Title III of the Higher Education Act of 1965, as amended.

I serve as the Associate Deputy Commissioner for higher and continuing education. My major duties and responsibilities are as follow, if I may quote from the introduction to my position description: "As Associate Deputy Commissioner for Higher and Continuing Education serves as alter-ego to the Deputy Commissioner. In this capacity, shares with the Deputy Commissioner responsibility for the formulation and development of Bureau policy and programs and the overall administration and management of the Bureau. Provides advice to the Deputy Commissioner on the development of Bureau policies, long range plans and goals; directs the day-to-day operations of the Bureau; and represents the Deputy Commissioner in liaison with the higher and continuing education community, educational groups and associations, and public and private organizations."

The Title III program is the largest of the programs administered in our Bureau. The program has a long and complex history. It is the only program in the Office of Education which provides any broad form of postsecondary institutional assistance. The program was originally conceived by the Congress as a mechanism to assist small and struggling black institutions in the aftermath of the passage of the Civil Rights Act of 1964. In the various reports and debates on the Higher Education Act of 1965, I think you will discover that the Congress viewed the program as one of general assistance for a select group of our postsecondary institutions that were, by statutory definition, "for financial or other reasons, struggling for survival and isolated from the main currents of academic life." Although this is an elegant use of language, the definition presents the Office of Education with a difficult problem in defining a struggling institution. It is obvious that the program is not designed to assist our great public and private universities. But one must use judgment in deciding what are the "other reasons" that cause an institution to struggle, or what factors, other than geographic location, characterize an institution as "isolated from the main currents of academic life."

Program regulations for the Title III program were first published in 1975. In these regulations, eligibility to participate in the program was determined from a group of quantitative and qualitative factors which seem to have been a composite of institutional characteristics of colleges and universities that participated in the program during the 1972 program year. We were advised on several occasions by our Office of General Counsel that these factors were outdated and possibly could not be defended legally. Attempts to reach consensus among the various offices in OE and HEW on the critical management and regulatory issues was not extremely productive. It was in this environment that the first GAO report on the title was published. That report, as you no doubt have discovered, advanced several recommendations which addressed the need for regulatory changes, for a clear determination of eligibility to participate in the program, and for improved program management. These were the same issues that we in OE had identified previously.

In the summer of 1978, the Title III regulations were selected under the Department's "Operation Common Sense" for rewriting. This was to be an attempt to rewrite regulations in uncomplicated English. We at the Bureau level were able to persuade the Department that the regulations were in need of a fundamental overhaul.

Our reasoning resulted from a number of factors:

We had created administratively two components for the program in 1972. A basic institutional development program (BIDP) made single-year awards to one set of institutions. An advanced institutional development program (AIDP) made multiyear awards to a group of stronger institutions that could be assured of significant funding over a specific time period. By 1978, it was apparent to many individuals that this distinction was artificial and in need of rethinking.

We had a small professional staff to monitor an extremely complex program. Consolidation of the staff was necessary to pull together the BIDP and AIDP components in a single program.

Changes in emphasis seemed necessary as a result of significant shifts in the economy of the country. Many of our developing institutions were severely troubled as the result of declining enrollments and the impact of spiraling inflation.

We had reviewed the second GAO report in draft. We wanted to respond to many of the recommendations about the requirements for eligibility and for more effective program management.

The proposed regulations were published on February 2, 1979, on the same day that applications were due for the fiscal year 1979 competition for funds. The regulations raised questions in certain parts of the country due to: (1) the belief on the part of a large number of institutional representatives that the shift to student characteristics and financial stability (BEOG's and E. & G. expenditures per full-time student) were not the clearly discernible factors which isolated one set of institutions from another; and (2) the fact that some insitutions that had participated in the program previously were no longer eligible under our new requirement.

As a result, Congress intervened and requested that the final regulations, published in late March, be modified to make all institutions which had participated in the program in fiscal year 1978 eligible institutions. One immediate result of this decision to "grandfather" institutions was to reopen the application process for the "grandfathered institutions." This was to cause a significant delay in announcing grant awards because of a need to allow an additional time period for the newly eligible institutions. The net effect was to delay the process of granting awards leading to the apparent chaotic state of affairs in which we found ourselves during the month of September.

Another point which has been a source of inquiry from your office relates to my specific role in the review process. It is clearly my function to review all charts or slates which show the variables and processes by which decisions are made. Some of these are clear and concise but at other times they are clumsy and require considerable revision. I try to provide that leadership. The end result is not deception but an effort to give to the public the most refined approach possible in a discretionary grant program. For example, the first chart presented to me included an almost impossible array of factors upon which decisions would be made. As I recall these working sheets, the following items were displayed:

The institution, its proposed rank order, the recommended rank order of the field readers, the recommended rank order of the staff, the evaluation points recommended by field readers, the evaluation points recommended by the staff, the appropriate points derived from the two headings above, a mini-chart showing whether the field readers and staff recommended funding or not, the amount of funds requested by the institution, the amount of funds recommended by field readers, the amount of funds recommended by the staff, the appropriate funding level determined from the two items above, the length of time requested by the institution, the length of time recommended by the field readers, the length of time rcommended by the staff, and the appropriate year(s) for funding determined from the two items above. Needless to say, a document which includes this many variables is cumbersome.

Of considerable concern to me were the number of technical errors. In too many cases, there was little correlation in the appropriate points assigned. In some instances, they exceeded the maximum or they were below the minimum. In most cases, if commissioner's points were assigned, there was no indication of the number assigned. This resulted not from negligence or malfeasance, but because of the extreme time pressure which we were under. The staff, quite rightly, wanted to display as many of the variables as possible for our initial review because of the extremely sensitive nature of funding decisions. This was a particular concern because of the GAO criticism of earlier funding recommendations.

Our review process is fairly complicated. The first formal slate that was prepared for our approval continued to contain errors and was returned for internal corrections. A second slate was ultimately prepared and reviewed by me and the Deputy Commissioner. It was at this stage that we also examined the slate for various initiatives—from the White House for black institutions, from the Secretary's office for support to the Hispanic community, and from the Commissioner's office for assistance to native Americans.

My review was straightforward: To determine the accuracy of the rank order, whether funds appeared to be sufficient in terms of any previous awards, or whether we were awarding too large a grant to an institution that had never participated in the program and about which we had no information as to the institution's fiscal capabilities. Furthermore, we were all mindful, I think, of our lateness and what that lateness was doing to institutions that were depending upon these moneys for additional staff and for activities. Judgments were called for, and, quite frankly, that is one of my responsibilities, to decide what the impact might be if funds are cut by any significant factor from a previous year. What would happen. I had to consider, if an institution received $500,000 in fiscal year 1978 but was scheduled to receive only $200,000 in fiscal year 1979?

All of us were also aware that we would be most vulnerable to criticisms from institutions which were not recommended for funding. I asked for a specific re-review of each of these institutions, especially those that had participated in the program previously and were not recommended for awards. We had held extensive discussions earlier about eligibility requirements in order to be absolutely certain that no eligible institution was denied inadvertently the right to participate in the program, especially those institutions that were "grandfathered" either as direct grantees or as participants in consortia. As I recall, approximately 161 institutions comprised the "Grandfathered" group.

Slates were approved at the Bureau level by the Deputy Commissioner and then reviewed by the Acting Commissioner and the Executive Deputy Commissioner for educational programs and by representative from the Office of the Inspector General's office because of the sensitive nature of this program and to try to assure that earlier criticism of the review process was abated. After this review and approval, the slates were transmitted to the Grants and Procurement Management Division (GPMD).

In late September it came to our attention that as a result of grant negotiations, about $1.3 million would not be obligated. I was presented with two options: to lower the cut-off point and fund several new institutions, or to increase several institutions that had been affected seriously by funding recommendations. I recommended to the Deputy Commissioner the latter option because I firmly believe that when we make sound education judgments for a cut-off point, it becomes capricious to alter that cutoff to satisfy one or two more institutions, thereby sacrificing the quality of a program. Adding additional funds presented no real problem inasmuch as we received an overall request from the applicant institutions for more than $550 million but an appropriation of only $120 million.

Two memoranda were prepared recommending a total of 15 institutions for additional funds. In our final discussions with GPMD personnel, I was informed by them that they could approve only 5 institutions because of time pressure. That is the list that you presented to me at my last appearance before the subcommittee. That list was prepared in my office about 5:00 p.m. on September 28, a Friday afternoon, and was handcarried to GPMD on the floor above.

There were obvious mistakes in the Title III slates for fiscal year 1979. However, they were not deliberate, nor were they intended to circumvent the congressional mandate to fund deserving institutions. Many of the mistakes were arithmetic. Others were more complicated: when decisions were made to support field reader recommendations in some instances and staff recommendations in others. In every case, I tried to use my best professional judgment to assure a fair and an equitable distribution of funds and to make certain that the slates could be defended. You are possibly not aware that we had more funds for institutional assistance available in fiscal year 1979 than in any previous year because of our new regulations that made all institutions eligible for multiyear awards. In previous years about $52 million had been available under the BIDP program and $58 million had been available in the AIDP program. Since AIDP made substantial awards over a multiyear period, we did not feel that this was advisable in fiscal year 1979 because of reauthorization activities that might change the program. We were also aware that a majority of our AIDP institutions were simply not eligible for additional assistance unless we awarded supplemental funds. We did not believe that this was a wise course of action.

There are many program factors that on the surfce may appear to be questionable. You raised one at our last hearing when you asked why we gave an award to Canisius College after readers tended to believe that the institution did not qualify as a developing institution. That is a judgment that the field readers have no right to question. The college was eligible because it was a "Grandfathered" institution. The readers were instructed not to make such comments, furthermore, since eligibility is a separate issue from an application evaluation process.

The "Grandfathering" issue continues to confuse some of our staff. There was a recent report in the press recording Inupiat University of the Arctic and a staff recommendation to terminate the award because the institution did not qualify for assistance. Inupiat University of the Arctic was a member of the American Indian Higher Education Commission's consortium in fiscal year 1978. It is obviously "Grandfathered", whether the staff or the readers may like it or not.

I do not want to apologize continually for our administration of the Title III program, but I do want to suggest that it is an extremely complicated program which deals with curriculum development, staff and faculty development, fiscal and management capability, and the development of student supportive services. Its complexities require an extremely capable monitoring staff and we simply have not had such a staff available in sufficient numbers to montior this program adequately. There are more than 400 institutions with direct assistance and nearly 600 institutions if we include consortia participants without direct assistance. Our professional staff has never numbered more than about 15 individuals. Many of them have had no experience as institutional administrators or as faculty members. Our efforts to train the staff have been hampered by lack of sufficient funds and time.

Nevertheless, we have made significant progress in Title III this year:

By combining the BIDP and AIDP staffs, we have a more effective monitoring effort under way.

We have identified our most troubled institutions and we have undertaken joint site-visits with GPMD.

We have instituted a significant set of training programs for student financial aid officers at Title III institutions under the sponsorship of the Bureau of Student Financial Assistance.

We have revised our list of field readers in an effort to avoid conflict-of-interest situations.

We have completed the reorganization of the Division, including a recent change in leadership.

We have developed a series of site-visits to assisting agencies prior to audits of such agencies that will be undertaken by the HEW Audit Agency.

We have recently approved a new and elaborate evaluation process that institutes a number of reforms. Field readers will read applications for the first 100 points; the staff review will be limited to the 75 points assigned for program priorities; and the division director will recommend commissioner's points based upon a new uniformity. With the assistance of GPMD, we will normalize scores to assure fairness between the so-called "easy" and "hard" evaluators.

We are concluding two special studies that will evaluate the program.

Finally, we anticipate, of course, some changes that will result from reauthorization and a need to reexamine program regulations.

These are things that are in place. They will never be of assistance in all of those gray areas in which Federal officials must operate. Individuals at high levels of Government will be called upon to make hard decisions. And those decisions must be tempered with as much logic and reason as are made possible by our professional training as educators and as managers. Let me give you one example, and I draw that example from your own region. I was informed that a majority of the new American Indian community colleges would not qualify for Title III assistance because they did not meet the statutory requirements of legal authorization. I invited members of the American Indian Higher Education Commission to meet with me. This was obviously an extremely sensitive issue.

At the meeting, it was determined that each of the institutions existed as an extension center of an assisting institution. However, if these small and struggling institutions were ever themselves going to be in a position of assisting native Americans to receive postsecondary educational opportunities, it seemed to me that we had to recognize the uniqueness of the institutional environment and the fact that for the most part, these institutions meet the statutory requirements for an Indian waiver, that is, the 5-year rule. I assumed, perhaps incorrectly, that the waiver was a congressional way of saying that these institutions deserved consideration of a special, indeed, unique kind.

What was unique about this situation was that none of the institutions would be direct recipients of grants. Rather, at issue was whether the American Indian Higher Education Commission would be able to provide services and activities for these struggling tribal colleges. I felt that it should. However, I may be in technical violation of the statute. Subsequent events have tended to prove my initial judgment to be correct. A majority of the institutions are, in fact, proceeding satisfactorily toward accreditation and virtually all of them will be eligible for direct awards by fiscal year 1981.

I used this example because it shows a complex issue and certainly a sensitive one. I believe that any official who works with this unusual program must be extremely understanding of all of the complex issues that evidence "struggling" and/or "isolation." One must be flexible to understand the needs of the higher education community and to recognize that though commonalities do exist among institutions, each is separate, with its own characteristics and its own needs. Above all, one must recognize the tremendous good that has resulted from the program for the last 14 years. Without Title III, the record of institutions closing in this country would be far greater than it is.

[Attachment clarifying subcommittee staff memorandum of December 11, 1979 follows:]

[Memorandum]

January 21, 1980.

To: Associate Deputy Commissioner for Higher and Continuing Education.
From: William Blakey, Deputy Assistant Secretary for Legislation (Education).
Subject: Clarification of the Record.

To: Senator Baucus,
Chairman, Subcommittee on Limitations of Contracted and Delegated Authority, Senate Committee on the Judiciary

During your hearings on the title III program, December 12, 1979, you presented me with a memorandum from your staff, dated December 11, regarding Changes in the fiscal year 1979 Slate for Four-Year Schools shortly before recessing the session for a pending vote in the Senate.

I would like to note for the record that the memorandum may omit several items of considerable importance in interpreting the figures. Consequently, I have prepared the attached table to clarify the record.

Attachment.

Leonard H. O. Spearman.

Institution	Actual level of funding		Years of award	Spending rate per year
	Fiscal year 1978	Fiscal year 1979		
Florida Memorial College	$514,000	$1,030,000	2	$515,000
Huston-Tillotson College	589,500	1,267,000	2	633,500
LeMoyne Owen College	514,500	1,029,000	2	514,500
Wilberforce University	[1]	1,074,000	2	537,000
Oakland City College	0	123,000	1	123,000
Catholic University of Puerto Rico	279,500	230,000	1	230,000
St. Mary's College of the Plains	64,000	100,000	1	100,000
Pembroke State University [2]	100,000	800,000	4	200,000
Bloomfield College	91,000	540,000	2	270,000
Roosevelt University	0	300,000	1	300,000

[1] AIDP award of $2,685,000 dating from 1975 at a rate of $537,000 per year.

[2] This award was declined by the institution. The fiscal year 1978 award was a bilateria. The fiscal year 1979 award was a consortium.

Senator Baucus. The next witness is Dr. Alfred L. Moye.

Dr. Moye, would you raise your right hand.

Do you solemnly swear to tell the truth, the whole truth, and nothing but the truth?

Dr. Moye. I do.

SWORN TESTIMONY OF ALFRED L. MOYE, DEPUTY COMMISSIONER FOR HIGHER AND CONTINUING EDUCATION, HEW

Senator Baucus. Thank you, Dr. Moye. I am sure you have been listening carefully to the preceding testimony and I would like your response to the statements of Dr. Brantley and Dr. Spearman. There seems to be some confusion as to how many changes have been made or not made. There seems to be general agreement that a lot of changes could have been much better documented.

I am just curious what your reaction is to both those points. As the overall supervisor of this program, I understand it's your responsibility to sign off on the slates. What are your reactions to the points I've mentioned and what are you doing to remedy the problem to the degree you can?

Dr. MOYE. Senator Baucus, I welcome this opportunity to comment on what I have heard.

Senator Cochran, I appreciate your last response because I think the record ought to reflect a balance that you tried to bring to it.

Let me say, sir, first that Dr. Spearman's involvement in changing funding recommendations is far more than just discretionary. It goes beyond discretion. It gets into basic program management of our activities. It's program matter.

When Dr. Brantley presented me with the first worksheet for this slate, I reviewed it in the presence of Dr. Brantley and Dr. Spearman, I believe, and determined that the staff work was absolutely abominable.

When I inquired of Dr. Brantley as to why he even presented that kind of staff work to me, he indicated he wanted me to see the entire thing, to see the quality of work that had been presented to him.

I responded by saying "I would not present that kind of work to my boss."

I then directed Dr. Spearman to get on top of the entire process, to get totally involved in the operation. I had previously instructed Dr. Brantley that he should not simply take the word of his staff, some of whom have created problems by their advice in the past, and that he should personally be totally involved in the entire process.

When I saw the worksheet slate that was presented to me, I felt we had to take upon ourselves to carefully scrutinize the process. Therefore, I consider Dr. Spearman's involvement to be part of the staff work, and not any exercise of discretion.

I can give you example after example of the kind of thing that could not be used that came to us from the staff.

My instructions to him were to make sure that when I was asked to renew the recommendation that the slate itself was presentable.

Senator BAUCUS. Then you are saying there were a great number of changes made——

Dr. MOYE. There were changes made and I would like to reiterate what Dr. Spearman indicated to you. The changes that were made between June 18 or 19, whatever the date was, and the time we presented the slate would be quite different than what happened following the presentation of the slate to Mr. Will's office.

We are talking about fundamental staff work, correcting mistakes, making sure we have eliminated biases on the part of our new people and et cetera, et cetera.

So it is fundamental staff work that we were looking at, at that point.

Senator BAUCUS. I am a little concerned about documentation here.

In the list I gave to Dr. Spearman of the major changes, some grant amounts doubled.

Dr. Moye. Let me give you an example of how documentation can tie us up in knots when that documentation produces no meaningful results.

Senator Baucus. I am sure documentation can tie you up in knots, but what we are addressing here is the lack of documentation. That's the issue.

Dr. Moye. Let me complete my statement, please. As one example, we had a set of proposals that would not be funded under any circumstances because they had been done so poorly; they were significantly below the cutoff point; however, I saw in the slate some discrepancies between scores of readers and scores of staff which were totally unexplained. Even though those schools would not be funded I felt that we had to make sure that we could explain to my bosses why, indeed, those discrepancies were there.

Now, it did not affect the funding process. It is registered, I am sure, as a change but it is really something that I felt did not need to document.

Senator Baucus. Well, I wonder. I have looked at some of those proposals and I have seen wide discrepancies, such as you mention, in readers' evaluations. There are three readers, and one score is 140, another is 180, another is in the seventies. That's a certain set of discrepancies with variations that are typical and difficult to explain.

There is another category where all the readers give the school roughly the same score and fund level recommendation. But lo and behold, with no explanation, suddenly the funding institution gets twice as much or half as much funding—clearly contrary to the suggestion of the readers. That is, the readers agree but there is no reason given for the change you, Dr. Spearman, or someone else might have made.

That is the kind of problem I see.

Dr. Moye. The problem, sir, stems from the fact that readers make their recommendations for funding based on perhaps 15 institutions whose proposals they have read for. They do not make their recommendations based on a limited pot of money. So we cannot adhere strictly to what the readers say. Additionally, in some cases the readers are recommending funds for activities which we know are illegal activities. We cannot go along with those kinds of recommendations. So there are many reasons why reader recommendations may not be followed.

Senator Baucus. Are you blaming Dr. Brantley for all the problems?

Dr. Moye. Absolutely not. I resent the statement, sir.

Senator Baucus. But you seem to be saying that the staff work is abominable. Those are your words.

Dr. Moye. I said the staff work was abominable. I did not say that Dr. Brantley was abominable.

Senator Baucus. Are you saying that the staff work below Dr. Spearman was abominable?

Dr. Moye. There was staff work that Dr. Brantley received and presented to me in the initial worksheet that was absolutely ridiculous. And he would be the first to tell you that.

As I indicated, also, he told me that he wanted me to see the entire thing—to have a feel for what he had received.

Senator Baucus. It perplexes me, frankly, as you talk of all these problems. You are the head of the program so why didn't you make some changes? If the staff work was abominable, why didn't you change the staff? Why didn't you remedy the problems?

Dr. Moye. Sir, several reasons. We operate on the Civil Service System.

Senator Baucus. Well, Dr. Brantley seems not to be today where he was a month ago. [Laughter.]

Senator Baucus. And you have been around more than 1 month. [No response.]

Senator Baucus. Well, I am not saying that's the problem. I don't know if that's the problem. If it is, and you say it is, those changes could have been made some time ago.

Dr. Moye. I am not going to give even a slight hint that Dr. Brantley is the sole problem, sir.

Senator Baucus. I am not saying you are.

Dr. Moye. I am suggesting, also, that you do not change a whole team or one of your leaders of a team just because you detect poor staff work; and, second, I would say that you do not correct the poor staff work after the fact by removing the individuals; and, third, I would say we are trying like mad to correct some of the problems we know exist in the staffing of that program.

We are not simply putting our heads in the sand pretending as if it doesn't exist.

Senator Baucus. It just seems to me if there is a problem with staff—I am not in any position to know whether or not there is, I can't pass judgment on that and I don't want to—but if there is poor staff work, it seems to me any responsible manager ought to remedy it. He can either educate staff or replace it with people who know what they are doing. I think that's the normal procedure.

Dr. Moye. Let me repeat my last statement. We are trying to correct the problems but we have a system within which it is very difficult to operate.

Senator Baucus. Let me get to another area here. Both Dr. Brantley and Dr. Spearman said they thought documentation of changes was very poor. Do you agree with those statements?

Dr. Moye. I agree with the statement with respect to the documentation that we sent to GPMD following the initial slate. I don't know if I totally agree with the statement with respect to every single change that Dr. Spearman had to make or that the staff made at his request.

Senator Baucus. By and large you agree with it?

Dr. Moye. Yes; I have no problems with the basic criticism of our documentation situation.

Senator Baucus. You think there should be more documentation?

Dr. Moye. Much better documentation, yes.

Senator Baucus. More than there has been in the past?

Dr. Moye. Yes.

Senator Baucus. How many proposals have you personally read?

Dr. Moye. I have read none.

Senator BAUCUS. Why is that?

Dr. MOYE. Why is that?

Senator BAUCUS. Why have you not read any?

Dr. MOYE. I do not read proposals in any of my programs.

Senator BAUCUS. If the staff work in developing the proposals is so bad, why don't you yourself look at the proposals?

Dr. MOYE. I have a Division Director, I have an Associate Deputy, and I delegate those responsibilities to those individuals who serve as my advisers. But I don't read proposals myself. I respect the judgments of individuals to whom I gave this assignment.

Senator BAUCUS. Don't you think it might be helpful for you to rummage around and get up from behind your desk and go downstairs, or upstairs, wherever the proposals are, and look at one or two and get a feel for what's going on?

I don't wish to appear presumptuous, but in my own job I find that if I want to know what's going on, it's helpful to get up from behind my desk walk through the secretary's office, look at the mail and see what the problems are. That gives me a better flavor for making decisions regarding those problems.

It seems to me it would be helpful for you to look at some of these proposals.

Dr. MOYE. I have read proposals, but not during the funding process. I have not reviewed proposals during the funding process.

I have reviewed them for my own information. I know what's going on.

Senator BAUCUS. But it would seem to me if you are ultimately responsible for determining which schools get what number of dollars, you should look at those proposals, or at least some of them.

Dr. MOYE. Sir, I am responsible for 20 discretionary programs. We receive 500 to 600 proposals in title III. We review 2,000 proposals in another program. I would be—I could not possibly pretend to be able to read proposals from every single program for which I am responsible.

Senator BAUCUS. I am not saying "every single."

Dr. MOYE. Or even a sampling of every program.

Senator BAUCUS. I am suggesting one. Look at one or two. Especially in light of the trouble this program has been having. I would think that with the publicity that has been going on for months, you might have looked at one proposal.

Dr. MOYE. Without sounding disrespectful, sir, the problems that this program had would not be solved in any way by my reading a proposal.

Senator BAUCUS. That might well be, but I would like to know why it is. Why is that?

Dr. MOYE. The problems have not been with the proposals themselves, whether they are written well, or are quality proposals. I think from what I have seen, the sampling I have been involved in—and certainly from my staff reporting to me—the proposals are by and large good proposals. Even some of those that we don't have money to fund are good proposals.

Senator BAUCUS. Well, if they are good proposals, then why aren't those recommendations being followed more frequently?

Dr. MOYE. What recommendations, sir?

Senator BAUCUS. The staff recommendations.

Dr. MOYE. The staff recommendations should be reviewed by individuals who have the responsibility for doing that. Changes are inevitable when you exercise that responsibility. The program, when I first got here in 1977, had been criticized severely because we followed staff recommendations. It was severely criticized by one of the committees that I appeared before because we followed readers' recommendations.

I am not about to say that because of those two criticisms that on the one hand the staff recommendations are absolutely horrible in 100 percent of the cases; I would not say because of the criticism we received that the reader recommendations are 100 percent incorrect. By and large we do follow staff recommendations.

Senator BAUCUS. Frankly, I don't want to get involved in the bickering, but judging from the tone of what you are saying, and reading between the lines, and from my impression of preceding witnesses, I get the feeling this program needs a big shakeup. It needs people at all levels who are conscientious and dedicated to doing a very, very good job. I am sure that everybody in the program, yourself included, by and large is trying to do a good job. I must say quite candidly that I feel it is a problem partly of attitude and partly of trust in fellow employees whether they are superiors or staff. This world runs on trust—the more you trust people the more you get along together. With more trust, the better this program is going to be and the more we can try to work out some of these problems.

I just hope that whoever is involved in this program does approach it in the manner that it should be approached; that is, with conscientious hard work and dedicated service. After all, everybody in the executive branch of Government as well as the legislative branch is there to provide service to people in the best sense of that word.

I hope that that is what we find as this program continues.

Dr. MOYE. In support of my staff, I would say that dedication and conscientiousness have been their behavior patterns. There may be disagreements as to the decisions and how those are made, but I must say that there is no question that these are some of the most dedicated people that I have ever seen in my life.

Senator BAUCUS. That is, those that did such abominable work? [Laughter.]

[No response.]

Senator BAUCUS. And those are your words.

Dr. MOYE. Yes.

Senator BAUCUS. OK. I have no further questions.

Senator Cochran.

Senator COCHRAN. I have no questions, Mr. Chairman.

Senator BAUCUS. Thank you, Dr. Moye.

Our next witness will be Mr. Raymond Beaudet, Associate Director, Division of University and Nonprofit Audits, HEW Office of Inspector General.

Mr. Beaudet, do you solemnly swear to tell the truth, the whole truth, and nothing but the truth?

Mr. BEAUDET. I do.

SWORN TESTIMONY OF RAYMOND A. BEAUDET, ASSOCIATE DIRECTOR, DIVISION OF UNIVERSITY AND NONPROFIT AUDITS, OFFICE OF INSPECTOR GENERAL, HEW

Senator BAUCUS. Mr. Beaudet, as I mentioned, you are the Assistant Director of the Division of University and Nonprofit Audits in the Office of the Inspector General.

Mr. BEAUDET. The Associate Director, sir.

Senator BAUCUS. All right. Would you pull that mike up. It's a little hard to hear you.

Thank you.

That means you are responsible for audits of developing institutions in the title III program?

Mr. BEAUDET. Among other things, yes, sir.

Senator BAUCUS. Roughly what proportion of your work is devoted to title III? I am trying to get a feel for it. What percentage of your responsibilities falls into that area?

Mr. BEAUDET. The title III program is funded at about $120 million which is about 2½ percent of the total dollars that are going to institutions for which we have an audit responsibility. That is really my division.

Senator BAUCUS. So what percentage of your time or your office's time is spent there?

Mr. BEAUDET. We have devoted very little time to the title III program specifically. However, we have devoted quite a bit of time to what we call title III schools, and from 1970 until the present time there has been audits performed at over 400 of the 500 or so schools participating in the title III programs. Now most of that audit activity relates to student financial aid programs, but the types of audit findings will, in fact, disclose the types of problems which they have found in the student financial program and are apt to surface with respect to title III funds themselves.

Senator BAUCUS. I am a little unclear. Is there a distinction between audits of title III funds and audits of title III programs?

Mr. BEAUDET. I am not making that distinction. I am making the distinction that a title III school which not only qualifies for title III program funds, but it also participates in a number of other Federal programs, and a large part of their participation relates to the student financial aid programs which as I say are significant.

Senator BAUCUS. How many title III programs has your agency audited?

Mr. BEAUDET. I can give you the breakdown, sir. Since 1970 to 1973 there were 15 audits; from 1974 to 1976, 9; from 1977 to 1979 there have been 17. A total of 41 audits have been performed, and 21 of the 41 related strictly to title III matters at that school.

Senator BAUCUS. So 41 out of 800, is it?

Mr. BEAUDET. Out of 800.

Senator BAUCUS. Out of 800?

Mr. BEAUDET. Approximately.

Senator BAUCUS. Approximately. That would amount to roughly how many dollars? That is how many programs audited?

Mr. **Beaudet**. Of the title III schools where we did a title III audit of the title III program, I don't have a percentage figure but it would be a very small amount.

Senator **Baucus**. You're familiar, are you not, with the GAO reports concerning this program?

Mr. **Beaudet**. Yes, sir, I am.

Senator **Baucus**. Do you generally agree with the GAO conclusions that there are problems in the audits of title III matters?

Mr. **Beaudet**. I am not sure the GAO indicated that there are problems with the title III audits performed by the Audit Agency. I think what they were concerned with was the lack of audits in particular of the assisting agencies.

Senator **Baucus**. That's correct. Do you agree with that concern?

Are you concerned with the insufficient number of audits particularly with respect to the assisting agencies?

Mr. **Beaudet**. I am concerned with the lack of sufficient audits of all programs. I am not any more concerned with the lack of audits in the title III program than I am of any program for which we have not provided sufficient audit coverage. We have a staff of about 980, of which 916 are professional auditors. We have indicated to the Congress through Inspector General's various reports that we are short somewhere in the neighborhood of 1,000 auditors.

In that frame of reference, it indicates we cannot do all of the work expected of us.

Senator **Baucus**. You say you recommended 1,000 more; is that correct?

Mr. **Beaudet**. We have identified——

Senator **Baucus**. Or up to 1,000 including those you have now?

Mr. **Beaudet**. Excuse me?

Senator **Baucus**. The staff you have asked for is for 1,000 in addition to what you have now, or do you mean totally?

Mr. **Beaudet**. No; in addition. We have an unmet need of over 1,000 auditors to try to give coverage to the vast programs that HEW administers. We have a budget of close to $200 billion for which we have audit responsibility.

Senator **Baucus**. Among all the programs that you audit, do you feel that certain programs should be given more audit resources than others?

Mr. **Beaudet**. Yes.

Senator **Baucus**. You said earlier you feel all of them should be audited more. I am wondering if among all of them there are some that deserve more attention than others. That is, whether title III programs might deserve more attention than others?

Mr. **Beaudet**. No; that's exactly how we develop our annual audit work plan. Each of the Associate Directors each year have an area of responsibility. We identify the programs that we would like covered. Unfortunately when we identify all of our needs we find that they are substantially in excess of our resources.

We then must try to prioritize where we rank programs in what we think is according to risk, and in the ranking process the title III program has not shown, at least in our judgment, to be a significant problem as we have noted in other areas.

Senator **Baucus**. What other areas have more significant problems?

Mr. BEAUDET. Well, to illustrate, the areas of public welfare programs, fraud and abuse initiatives which have been in the medical field quite extensively, nursing homes, and what have you. Health maintenance organizations are an example. Community health centers. Drug abuse clinics. These types of programs are all, we think, in need of audit attention.

Senator BAUCUS. What would be a proper number of audits in your judgment to sufficiently cover the title III program? If there have been roughly 41 since 1970, out of 800 programs, I wonder——

Mr. BEAUDET. Let me correct that, Senator. There have been 21 that we have performed of title III. There have been an additional 20 that we have performed at a title III school but we did not do the title III program individually.

Senator BAUCUS. So it's only 21 then?

Mr. BEAUDET. It's 21 related to the title III program.

Senator BAUCUS. That is what I am concerned with, with the title III program.

Mr. BEAUDET. Yes.

Senator BAUCUS. It's 21?

Mr. BEAUDET. Yes.

Senator BAUCUS. Twenty-one out of eight hundred.

Mr. BEAUDET. Yes.

Senator BAUCUS. What would be a sufficient number of audits, do you think?

Mr. BEAUDET. I don't know that I could give a precise answer to that, as I relate it to our other priorities. We have now made a commitment as a result of the GAO conclusions that in this year's work plan we would give a comprehensive audit coverage to all of the assisting agencies, and this we have agreed to do and work is started on that.

In addition to the assisting agencies, we will be looking at the coordinating institutions, and this is for the tactics program and also for the action consortium. In addition to those we will make a selective sample of a number of schools that receive services under these programs.

Senator BAUCUS. Let me ask you another question. I have a memo dated January 24, 1978, from Morris L. Brown, Chief, Basic Institutional Development Branch, to the Acting Director of GPMD, John Tabor.

Staff is providing you a copy of that now.

[Document referred to follows:]

[Memorandum]

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE,
OFFICE OF EDUCATION.

Date: January 24, 1978.

To: John Tabor, Acting Director, Grants, Procurement and Management Division.

Through: Dr. Leonard H.O. Spearman, Acting Deputy Commissioner for Higher and Continuing Education. Dr. Paul H. Carnell, Acting Director, Division of Institutional Development.

From: Chief, Basic Institutional Development Branch.

Subject: Fort Valley State College, Ga.

At the meeting of July 20, 1977 attended by Dr. Ernest Boyer, Dr. John Ellis, Mr. Larry Gold, Ms. Cora Beebe, Dr. Paul Carnell, Dr. Robert Leetsma, and you, an agreement was reached to support three programs from 1978 Title III funds:

Fort Valley State College, Georgia—Doctoral, C.P.A. training program	$160,000
St. Paul's College—Moton Center	300,000
Imperial Valley College	150,000

On July 27, 1977 representatives from the American Accounting Association, the HEW Audit Agency (Ray Beaudet), Dr. Robert Leetsma, Ms. Lieberman, Dr. John Peo, Dr. Paul Carnell and I met to resolve the difficulties involved in the program.

For the 1978 year the Basic Program has not received an application from Fort Valley State College. However, we are in receipt of the 1977 application which was reviewed. In the light of this, we are asking your office to proceed in processing the grant to Fort Valley State College.

Attached please find the application, readers' reviews, and three copies of the 5378 forms required for funding by Title III.

MORRIS L. BROWN.

Senator BAUCUS. According to this memo you were present at a meeting with OE staff and representatives of the American Accounting Association to discuss funding of three programs under title III in fiscal 1978. I am a little concerned as to why an auditor would be present at a meeting to discuss funding of various institutions?

It has always been my understanding that auditors separate themselves very definitely and very firmly from program decisions. That is, the accountant is supposed to perform his auditing functions with impartiality and fairness and have a certain distance from program decisions.

I am curious as to why you were at that meeting to discuss three programs under title III.

Mr. BEAUDET. I was not in attendance at a July 20, 1977, meeting with Dr. Boyer and——

Senator BAUCUS. You say you were not at that meeting?

Mr. BEAUDET. No, sir, I was not. Not to my recollection, no, sir.

Senator BAUCUS. I am curious, the memo says that on July 27, 1977, representatives from the American Accounting Association, the HEW Audit Agency—and it has your name there.

Mr. BEAUDET. The July 27 meeting—I don't know whether I can confirm that as a specific date, but there was no representative from the American Accounting Association at any meeting that I attended.

Senator BAUCUS. Would it be proper for you to be there? Regardless of whether you were or were not there, would it be proper for you or somebody from the auditing agency to be at that kind of meeting?

Mr. BEAUDET. Well, if you are talking about the meeting of July 27, this was a meeting which was initiated at the request of the American Institute of CPA's of which I am a member. The meeting was initiated to follow up on an application that was before the Office of Education for funding.

Senator BAUCUS. But that is for title III funding.

Mr. BEAUDET. Title III funding, yes, sir.

Senator BAUCUS. I am trying to determine whether your office acted properly in doing its job. Would it be proper for you or someone in your office to attend a meeting where decisions are being made about funding or not funding certain institutions? That is not an audit function of course.

Mr. BEAUDET. This I think was not only proper, I think it was very justifiable. It was done on the order of following up at the request of the American Institute of CPA's of which I am a member serving on a government relations subcommittee of that membership; not only was I a member but a senior official of the General Accounting Office was also associated with me on the committee.

Senator BAUCUS. Let me ask you—go ahead.

Mr. BEAUDET. And the reason the meeting was held was that the American Institute was trying to find out from the Office of Education the status of a proposal which they had participated in. The staff member of the American Institute could not get people from the Office of Education to return calls or to discuss the matter with them. The staff director asked if I as well as this other individual would try to find out the status of the proposal, and this was what we were trying to do.

Senator BAUCUS. Let me ask you the same question again. Forgetting this particular meeting, hypothetically, do you think it is proper for you or someone in your office to participate with Drs. Spearman, Moye, or Brantley in determining whether or not a certain school should get a certain number of dollars?

Mr. BEAUDET. No; not in that frame of reference, no.

Senator BAUCUS. That's my question.

Mr. BEAUDET. And I would add that there was never any meeting where that was the frame of reference.

Senator BAUCUS. All right. One final point, Mr. Beaudet. As I have said earlier, I feel we are having some problems in this program. I would hope that despite your insufficient resources, and I grant you they are probably insufficient, you will take a hard look at title III to determine whether dollars are being spent properly or are being wasted.

I would hope that in these next months and years you can perform that function. It may be that you need the 1,000 additional auditors you mentioned, but many people would say you have too many programs: you could perform your function better by cutting out a few of them. It would be my firm hope that you will take a harder look at title III, harder than you have thus far. This would not be to prejudice it, or because I or anyone else thinks there is too much waste, but simply and plainly to determine whether dollars are being properly spent.

Mr. BEAUDET. Senator Baucus, we have a program to do that. As I have stated, we expect to have the most comprehensive audit of the assisting agencies that has ever been done and we think that the results will provide information which has heretofore not been developed. We are optimistic. I would also hope that in devoting resources to the title III program, the resources that we devote to that that we won't be criticized by the other committees that want us to do something else.

Senator BAUCUS. I understand that. I will do my best to help protect you in that area.

Mr. BEAUDET. I appreciate that.

Senator BAUCUS. Would you provide the subcommittee with a copy of the audit of the assisting agencies?

Mr. BEAUDET. Copy of what?

Senator BAUCUS. The copy of the audit of the assisting agencies, the one you referred to.

Mr. BEAUDET. Yes.

Senator BAUCUS. Thank you very much.

Mr. BEAUDET. Thank you.

Senator BAUCUS. The final witness is Mr. James Pickman, Executive Deputy Commissioner for Resources and Operations.

Would you raise your right hand.

Do you solemnly swear to tell the truth, the whole truth and nothing but the truth?

Mr. PICKMAN. I do.

SWORN TESTIMONY OF JAMES PICKMAN, EXECUTIVE DEPUTY COMMISSIONER FOR RESOURCES AND OPERATIONS, HEW

Senator BAUCUS. Thank you.

I want to thank you for coming, Mr. Pickman. You are Mr. Fred Will's immediate supervisor, is that correct?

Mr. PICKMAN. That is correct, yes, sir.

Senator BAUCUS. And you listened to Mr. Will's testimony of November 14 when he described what he felt were some of the problems in the title III program. I wonder if you could tell me whether you generally agree with what he said and second, whether you generally agree with the GAO conclusions which are critical of the title III program.

Mr. PICKMAN. In general I agree with Mr. Will's testimony of November 14. I also agree generally with the GAO report.

Senator BAUCUS. Do you have any significant points of difference with that report?

Mr. PICKMAN. I disagreed with some of Mr. Will's statement. I disagree with his contention that the regulations for the title III program should be scrapped. I disagree with I think the general tenor of his statement that this program is a disaster. I don't think it is. I think it is a quite salvageable program. I think improvements have been made to date and while acknowledging there is a way to go, I think that this program can be properly managed. I also disagree with Mr. Will when he says that he has not been given adequate support.

In terms of dollars, in terms of staffing and in terms at least of my intervention when he has raised concerns to my attention, he has been given a great deal of support, indeed more support than he has ever received before.

I also disagree with the statement he made that the management of the Office of Education stinks. I don't think it does.

I think we have made some great strides in the right direction. I would be pleased to provide for the record the various accomplishments that have been received in the administrative management area in the Office of Education, but generally speaking I do agree with what Mr. Will has stated.

[Information referred to follows:]

MANAGEMENT IMPROVEMENTS IN RESOURCE AND OPERATIONS

AUDITS

Major accomplishments in fiscal year 1979

Closed 1,115 audits through August 31, 1979.

Reduced percentage of total audits over 6 months old from 41 percent on September 30, 1978, to 21 percent on August 31, 1979.

Planned improvements for fiscal year 1980

Reduce number of audits outstanding.

1,151 audits were open as of August 31, 1979.

Continue to reduce percentage of audits over 6 months old.

Implement policies, procedures and work plans for transition from Office of Education to the Department of Education.

FINANCE

Major accomplishments in fiscal year 1979

Approximately $600,000 has been collected from October 1, 1978, to July 31, 1979.

Accounts receivable section has been put in order.

Two-month backlog of undeposited checks have been reduced to 25 days as of August 31, 1979.

Files have been revised and financial data is now reliable.

Planned improvements for fiscal year 1980

Reduce error file backlog and decrease error rate to 2 percent

Error rate was 11 percent as of August 31, 1979.

Backlog file stands at 39,147.

Reconcile Office of Education general ledger and subsidiary records.

Four thousand four hundred accounts to be reconciled as of August 31, 1979.

Reduce costs by improving collections.

Project to collect $600,000 between October 1, 1979, and December 31, 1979.

PERSONNEL

Major accomplishments in fiscal year 1979

Completed 93 percent of classification survey as of August 31, 1979.

Reduced processing time for SF-52's from 53 days to 35 days.

Implemented majority of civil service reform provisions.

Planned Improvements for fiscal year 1980

Completion of classification survey reports.

Standardization of position descriptions by September 30, 1980.

Complete and implement affirmative action recruitment plan of November 15, 1979.

Establish processing time standards for personnel actions.

GRANT AND PROCUREMENT MANAGEMENT

Major accomplishments in fiscal year 1979

Awarded 74.6 percent of Discretionary Grants by June 30.

In fiscal year 1978 only 44 percent were awarded by end of third quarter.

OE awarded over $11.6 million to minority businesses.

This represents almost doubling of goal established by DHEW for OE.

Major improvements for fiscal year 1980

Improve distribution of contract and grant awards over the fiscal year.

Improve minority business participation.

Achieve goal of awarding $13 million to minority business firms.

Develop and implement guidelines and procedures for the contract and grant process.

Collect formula grant data in the Grants Management System.

More efficient response to inquiries from management, Congress, and the public.

Provide required data to OMB (previously provided by DHEW).

MANAGEMENT SYSTEMS AND ANALYSIS

Major accomplishments in fiscal year 1979

Reorganized automatic data processing.

Conducted management audits of priority units.

Planned Improvements for fiscal year 1980

Develop and monitor R&O master calendar.

Improve position control of staff resources.

Establish ceilings for OTFTP.

Prepare monthly on-board reports for permanent positions

Formulate standard operating procedure for S&E formulation and execution.

Establish agency paperwork burden reduction targets and monitor.

REGULATIONS

Major accomplishments in fiscal year 1979

Streamlined regulations development process.

Before writing of regulations begins, review panels convene to identify key issues.

Review panels identify key persons and offices that need to be involved in the development process, thereby preventing the delays previously brought on by the involvement of too many offices.

OE published 30 sets of regulations in proposed rule form within 240 days of enactment of legislation (first time in the agency's history).

Improved format and content of regulations.

Regulations are more self-contained so that readers need not refer back to the laws from which they originate.

The Education Division General Administrative Regulations bring together more than 1,000 common provisions from program regulations. This will reduce hours of work for applicants and agency staff, as well as reduce unnecessary printing costs.

EFFICIENCIES IN PROGRAM ADMINISTRATION

Top management ascertained that the various OE grant programs were operating as separate and independent units, with little communication about efficient administrative or programmatic procedures. Therefore, two work groups were established in fiscal year 1979 to analyze the various common processes of OE programs and to identify means to achieve greater program coherence and operating efficiencies.

I. STATE FORMULA GRANT WORK GROUP

Identified, common activities and concerns of the State Formula Grant programs: monitoring, technical assistance, data collection, entitlement formulas, computation of data, State plan and application content and review, and notifications of entitlement sand grant awards.

Analyzed the programs' monitoring functions: Programs' individual current monitoring systems; relation of monitoring to the fraud, abuse, and waste initiative; HEW Audit Agency's role as complementing OE program monitoring efforts; and administrative and statutory mechanisms for enforcement in State Formula Grant programs.

Established a committee of the work group to develop a consistent, uniform monitoring policy and minimum standards for developing monitoring planning, content, and followup.

II. DISCRETIONARY GRANT WORK GROUP

Exploring the issue of developing computerized management information systems for storing data needed for grants administration.

Investigating the use of prior performance in selecting applicants for new and continuation awards.

Reduced the length of applications in fiscal year 1980 by approximately 40 percent from the fiscal year 1979 figure, thereby reducing total incoming pages by approximately 2.5 million a year.

Developing a guide to achieve uniformity in the conducting of on-site visits by clearly defining minimal standards and procedures to be used.

Developing priorities for monitoring site visits, including more equitable and rational allocation of travel funds in terms of clear priorities and standards.

Senator Baucus. Despite those differences?

Mr. Pickman. Despite those differences.

You asked me to comment on the differences, not on the things that I agree with.

Senator Baucus. All right.

If you generally agree, why don't you tell us where you agree?

Mr. Pickman. One, I think there has to be—I know Dr. Berry made this point and Dr. Moye and Dr. Spearman, and Dr. Brantley agreed—written justification of the decisions, discretionary decisions made by program managers. As Dr. Berry pointed out, these are discretionary programs, we are not to be bound automatically by the rankings of field readers.

The program officials that are responsible for running these programs are responsible for making final funding decisions. They are responsible for reviewing the rankings of field readers and for making judgments as to whether or not to accept them.

However, any change made between what a field reader scored or ranked, and what a program manager feels should be done in his or her discretion, that must be properly documented in writing. That has not been the practice in this program. I think that is one of the major failings.

While there is nothing wrong with exercising discretion, it must be documented in writing and it must stand up to scrutiny.

Senator Baucus. Why has it not been documented in the past?

Mr. Pickman. I guess I would have to say you would have to ask the people in the program. It should have been documented in the past.

As Mr. Will said, it would probably have been appropriate for him to have not accepted any of the grants or many of the grants that were proposed to be done at the end of the fiscal year because there was not sufficient documentation. However, the grants did not come to his office until the end of the fiscal year and he was under tremendous pressure to fund them and do the best he could in terms of getting at the program to provide the documentation. I can't answer the question, sir, as to why there has not been. There certainly should have been and there should be. And hopefully this year with a much more accelerated grant disbursements schedule there will be sufficient time to reject those decisions that are not adequately justified and insist that they be justified before any dollars are obligated.

Senator Baucus. How is the current funding cycle operating?

Mr. Pickman. As Dr. Berry pointed out we are projecting to notify Congress of the grantees by April 1, 1980. This is several months in advance of what it was last year.

Senator Baucus. Does it look like you will be able to meet that April date?

Mr. Pickman. I have been around long enough not to make a commitment like that but I hope so. I am not now aware of anything that will prevent the office from meeting that date.

Senator Baucus. What happens on April 1? Is the final notification sent out in April?

Mr. Pickman. The grantees will be notified that they will be receiving a grant.

Senator Baucus. OK, when will the grantee know the amount of the grant he is to receive?

Mr. Pickman. That occurs after negotiations take place between the Grants and Procurement Management Division and the grantee. Let me say that in the past the negotiations process has not been adequate in this program. That is partially because of insufficient time that the grants office has been given to undertake this process.

Last year there were some instances where grants were awarded and there were certain costs and activities not allowable under the program, so the review of the grants office working with the program officials determined which costs were allowable and which were not. A dollar amount originally designated by the program, after review by the grants office, could then be reduced because of certain unallowable costs. So it is at that point—after this process of reviewing some of the proposed uses of the funds—that a grantee should be informed of a dollar amount given out.

Senator Baucus. With this earler funding cycle, do you think you or Fred Will will be able to refuse a grant if there is not sufficient documentation for major changes between staff and the level of Dr. Spearman and Dr. Moye?

Mr. Pickman. I would hope so.

Senator Baucus. I asked the question because earlier you said Fred Will would have been justified in refusing to file the change, but he was under tremendous pressure because the fiscal year was ending.

Mr. Pickman. That's correct.

Senator Baucus. I wonder now, with the earlier dates that you are talking about, whether you and Fred Will will be justified in absolutely refusing to sign off if there is insufficient documentation for major changes?

Mr. Pickman. Yes, sir, to the extent that both Mr. Will and I have control, we will reject those proposals, yes, sir.

Senator Baucus. Do you have any views about the title III legislation as it passed the House? Are the changes there proper, or do you have other recommendations?

Mr. Pickman. No; I am not that familiar with it, sir, except to the extent that, as Dr. Berry has indicated changes have been made regarding the rule that institutions are required to contract with assisting agencies. I think that is a positive change.

I don't think drastic legislative change is needed. It is important to realize that the problems with this program are primarily administrative and internal management problems and I think we are making some progress in that regard.

Legislative reauthorization is not the end-all, sir; the problem has to do here with internal management.

Senator BAUCUS. Can you document for me what progress is being made internally in the administration, what changes are being made internally?

Mr. PICKMAN. One, as I mentioned earlier, is that if we have an earlier grant cycle it will enable the proper process to be followed in terms of reviewing of grants and awarding of funds.

Second, I believe as Dr. Berry pointed out in November, we are stepping up the orientation of field readers so they understand the program purposes, and so their judgments can be consistent with those purposes.

Third, what we did last year, and what we will do this year, but I hope much better is that we will make sure that everybody at the outset has plenty of agreement on what is the proper procedure for reviewing grants, and I want the grants office and program people to agree as they did last year, I want the Inspector General's Office to look at the procedure and endorse it as they did last year. But as we didn't do last year, I want to make sure that everything that is agreed upon happens.

I hope, as I said before that we have some more time and we can make sure that all of this occurs.

So that is something we will continue to do.

Fourth, we have eliminated blanket waivers of conflict of interest for fiscal year 1980. Often you have to look at each individual who is reading these applications to make sure that there are no conflicts of interest.

But with the blanket waiver, sometimes things fall between the cracks. I think we are going to do much better in that regard.

Senator BAUCUS. Under what circumstances were blanket waivers given? For my own information, what is that?

Mr. PICKMAN. Let me explain the way the blanket waiver works.

Every reader has to sign a statement saying that he or she has no financial interest in the institution whose grant application he or she is reading.

That is done regardless of whether there is a blanket waiver or not. My understanding is that when there is a blanket waiver, we look no further; that is as far as we look into it in terms of conflict of interest.

I raised a hypothetical question yesterday in discussing it with Mr. Will, that is, what if reader "X" happens to be affiliated with an institution and he happens to be reading an application from an institution that is 5 miles away? One might think if he were to rate a neighboring institution very highly it might hurt the funding chances of the institution with which he is affiliated.

Not granting that that would be the case, I said, "Well, in a blanket waiver would one get to look at some of these questions?" He said, "No, we don't look at that."

But if you abolish the blanket waiver you can start looking at those kinds of situations that might not appear on the conflict-of-interest forms.

You have to look very carefully at each reader, especially since a lot of those readers are affiliated with institutions that receive funds under these programs.

Senator BAUCUS. Are there any other changes you are aware of?

Mr. PICKMAN. There is one other thing. This past year we not only asked the individual readers what institutions they were affiliated with but also what assisting agencies they may be affiliated with. For example, if a reader is affiliated with a particular assisting agency and he or she is reading an application from an institution that has traditionally done business with that agency, I think it is something we ought to know about. Indeed, that reader ought to be barred from reading that particular application.

I directed a supplemental request to all readers to fill out new conflict-of-interest forms answering that specific question in this grant cycle, and we received, I believe, 57 responses indicating affiliations with assisting agencies and in two cases the readers read applications of institutions that had done business with the assisting agencies with which they were affiliated. We repaneled and had those particular applications reread.

So that was an improvement.

Further, we have set up over the past year a special section in the Grant and Procurement Management Division which deals exclusively with title III so we can give it the attention that I believe this program needs.

Also, we are working with the grantees to explain what their rights and responsibilities are with respect to assisting agencies.

In the past there were often no written contracts between an assisting agency and an institution. Some of the institutions didn't know exactly what service the assisting agencies were required to provide.

We are now requiring written contracts between institutions and assisting agencies and our grants office is reviewing those contracts to make sure that the services that are provided are set out.

As you know and as Mr. Beaudet testified, we are now having the HEW Audit Agency looking at these assisting agencies. We are very interested in the results of that audit and looking forward to seeing what we can learn from it.

In addition, and always, as I mentioned earlier, the grants office is negotiating awards. We are going to look behind the dollar amounts given by the programs and we are now looking to see which costs are allowable and which ones are not.

Just one further note, and that is that I know Mr. Will complained last week about the inadequate staffing and dollar amounts for his office. The differences between 1980 and 1979 are significant in terms of greater dollars and a greater number of people for his office.

As to GPMD's salaries and expenses budget for 1979, the Division received $3.9 million. In 1980 we expect we will receive $4.5 million.

In terms of people on board, there were 156 on board in 1979. We hope it will be at 169 in 1980.

This is one of our priority areas. Many, many programs in the Office of Education are having to absorb either no increases or cuts in staffing and this is just one priority area which we are buttressing.

So, again, I think we are moving in the right direction. I will certainly not say that we have solved all of our problems and I think you, or some other committee, ought to call us back in a year and see how we have done and hold us accountable for making the changes that are needed.

But I think we are moving in the right direction.

Senator BAUCUS. OK, Mr. Pickman. I want to thank you very much. You might be sorry for that last suggestion. But I think somebody will be back with you because of the reasons I have previously mentioned.

I particularly want to thank you for your help in summarizing administrative changes and in providing recommendations, some of which may be put in regulations over the next few months. I think there are ways we can improve title III and you have certainly outlined some of them.

Finally, I want to echo earlier statements I made that this program is a good one, it is meritorious, and it is deserving of support. But it needs a lot of help, and it needs a lot of reform.

If people in title III would stop pointing the finger at each other and begin to work together more, then with the whole being greater than the sum of its parts, we could come up with a better program. With better cooperation of all involved and a better dedication to the goals of this program, title III could do what it was designed to accomplish.

Thank you very much, Mr. Pickman.

That concludes the hearing.

[Whereupon, at 12:38 p.m., the subcommittee adjourned subject to the call of the Chair.]

$150,300

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE OFFICE OF EDUCATION WASHINGTON, D.C. 20202 **GRANT APPLICATION FOR STRENGTHENING DEVELOPING INSTITUTIONS PROGRAM** *(Authority: Title III, Higher Education Act, 1965, P.L. 89-329)*	ACTIVITY NUMBER 1	PAGE NO. 1	FORM APPROVED O.M.B. NO. 51-R0986
		NUMBER OF PAGES 2	PART II CONSORTIUM PARTICIPANTS

1. NAME OF APPLICANT INSTITUTION Florida Junior College at Jacksonville	2. ACTIVITY TITLE Planning for Fiscal Stability

3. PARTICIPATING INSTITUTIONS

a. NAME	b. LOCATION *(City and State)*	c. DEVELOPING STATUS	d. FUNDS REQUESTED	e. NO. NTF's REQUESTED	f. NO. PE's REQUESTED
California					
College of Alameda	Alameda, California	No	$12,525*	None	None
Florida					
x Florida Junior College at Jacksonville	Jacksonville, Florida	Yes	$12,525*	None	None
x St. Petersburg Junior College	St. Petersburg, Florida	Yes	$12,525*	None	None
Illinois					
x Lewis and Clark Community College	Godfrey, Illinois	Yes	$12,525*	None	None
Iowa					
x Southwestern Community College	Creston, Iowa	Yes	$12,525*	None	None
Massachusetts					
x Wentworth Institute of Technology	Boston, Mass.	Yes	$12,525*	None	None
Michigan					
Alpena Community College	Alpena, Michigan	No	$12,525*	None	None
Mississippi					
Mary Holmes College	West Point, Mississippi	No	$12,525*	None	None
New Jersey					
Cumberland County College	Vineland, New Jersey	No	$12,525*	None	None
New York					
Medaille College	Buffalo, New York	No	$12,525*	None	None
Mercy College	Dobbs Ferry, New York	No	$12,525*	None	None

OE FORM 1049-1, 11/74 (FM Control No. 67)

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

GRANT APPLICATION FOR STRENGTHENING DEVELOPING INSTITUTIONS PROGRAM
(Authority: Title III, Higher Education Act, 1965, P.L. 89-329)

ACTIVITY NUMBER 1	PAGE NO. 2	NUMBER OF PAGES 2	FORM APPROVED O.M.B. NO. 51-R0936 PART II CONSORTIUM PARTICIPANTS

1. NAME OF APPLICANT INSTITUTION: Florida Junior College at Jacksonville

2. ACTIVITY TITLE: Planning for Fiscal Stability

3. PARTICIPATING INSTITUTIONS

a. NAME	b. LOCATION (City and State)	c. DEVELOPING STATUS	d. FUNDS REQUESTED	e. NO. NTF's REQUESTED	f. NO. PE's REQUESTED
Oklahoma					
Claremore College	Claremore, Oklahoma	Yes	$12,525*	None	None
Murray State College	Tishomingo, Oklahoma	No	$12,525*	None	None
Pennsylvania					
King's College	Wilkes-Barre, Penn.	Yes	$12,525*	None	None
Lackawanna Junior College	Scranton, Penn.	Yes	$12,525*	None	None
Northeastern Christian Junior College	Villanova, Penn.	Yes	$12,525*	None	None
Williamsport Area Community College	Williamsport, Penn.	Yes	$12,525*	None	None
Tennessee					
Roane State Community College	Harriman, Tennessee	Yes	$12,525*	None	None
Washington					
Wenatchee Valley College	Wenatchee, Washington	No	$12,525*	None	None
Yakima Valley College	Yakima, Washington	Yes	$12,525*	None	None

* The total amount of the grant less the funds allocated for program administration by the coordinating institution is $250,340. Therefore, the amount of funds shown for each participating institution represents their proportional share of $250,340.

OE FORM 1049-1, 11/74 (FM Control No. 87)

APPENDIX A
TO THE
LETTER OF AGREEMENT BETWEEN
FLORIDA JUNIOR COLLEGE AT JACKSONVILLE
AND
McMANIS ASSOCIATES, INC.

SCOPE OF SERVICES

Under this Agreement, McMANIS and FLORIDA JUNIOR COLLEGE AT JACKSONVILLE will cooperate to achieve the outcomes of each of the tasks set forth below. McMANIS will provide the professional services described and FLORIDA JUNIOR COLLEGE will make best efforts to facilitate the work of McMANIS. The time-phased plan of action for the consortium given here in *Table 1* will be used as a basic guide for carrying out the tasks. FLORIDA JUNIOR COLLEGE may, however, when a task is dependent upon completion of another task, make adjustments to this schedule when doing so will facilitate successful completion of the tasks and impose a reasonable delay in the initiation of the dependent task.

The price stated for each task is the best estimate by McMANIS, at the time of execution of this Agreement, of funds required to provide the services specified therein. McMANIS and FLORIDA JUNIOR COLLEGE may, by mutual agreement, amend the task descriptions or the level of professional services devoted thereto, to ensure the maximum benefit from funds obligated to the Agreement.

TASK 1. *Information Dissemination.* McManis will collect information about institutional planning, package the information for use by member institutions in the design of their planning systems, and distribute it to them. In addition, McManis will produce four newsletters that will describe the efforts being made in the development of planning systems at other institutions. $17,000

TASK 2. *Regional Conferences.* McManis will identify the planning topics of greatest interest to member institutions, design a series of four workshops that address these topics, coordinate and schedule the workshops, and analyze the evaluations submitted by the participants. The end result of these workshops will be to provide the member institutions with specific guidance on the design of planning systems, planning techniques, data collection methods, and the establishment of linkages with other management systems. $21,200

TASK 3. *Technical Assistance.* McManis will inform member institutions of the nature of technical assistance available; analyze, in conjunction with FJC, the requests for technical assistance from each member institution; provide the technical assistance requested, within terms of the grant; and review the evaluations by member institutions following completion of the technical assistance. The purpose of these on-site visits would be to provide assistance in the design and implementation of institutional planning systems, as well as supportive studies such as needs assessment, community impact, and organizational patterns. $94,000

Total $132,200

APPENDIX B

APPENDIX B
FLORIDA JUNIOR COLLEGE AT JACKSONVILLE

COST/PRICE ANALYSIS

Labor	Hours	Avg. Rate	Total
Officers	40	$24.28	$ 971
Division Director	176	19.61	3,451
Senior Associate	1590	14.91	23,707
Associate	160	9.08	1,453
Administrative	760	5.84	4,438
			$ 34,020
Fringes (22%)			7,484
	Total Labor		$ 41,504
Overhead (120% Total Labor)			49,805
Materials and Supplies			3,000
*Travel			25,920
	Total Cost		$120,229
Fee (10% Total Cost)			12,023
	Price		$132,252
	Fixed Price Quote		$132,200

*17 colleges x 3 trips @ $200 (avg.) = $10,800
4 conferences x 2 trips @ $200 (avg.) = 1,600
Living expenses: 169 days @ $45 = 7,005
Auto: 169 days @ $35 5,915

$25,920

This cost/price analysis conforms with Federal cost principles. Rates for fringe benefits and overhead are those quoted to and accepted by the Federal Government. Our financial accounts have been audited (by HEW, EPA, AID, etc.) per routine pre-award and postcontract procedures. No exceptions have been taken.

Pitts

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PRN) 454AH 90121	2. TYPE OF REQUEST (check one) ☒N ☐C ☐S ☐K ☐M	3. GRANT NUMBER (if C, S, M request)
4. NAME OF APPLICANT FLORIDA JUNIOR COLLEGE AT JACKSONVILLE		5. ENTITY NUMBER (EN) 1-59-114-9317-A1

6A. BUDGET PERIOD →	BEGIN DATE	END DATE	6B. PERFORMANCE PERIOD →	BEGIN DATE	END DATE	6C. PROJECT LENGTH (months) 12

7. REPORTS	DUE DATES			8. OE PROJECT OFFICER
A. QUARTERLY				NAME LORETTA WAWRZYNIAK
B. SEMIANNUAL	✓		▨	9. GRANTEE'S PROJECT DIRECTOR
C. ANNUAL		▨	▨	NAME (904) 358-1812, Ext. 310
D. FINAL	✓	▨	▨	STEPHEN R. WISE

E. EVALUATION ✓

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	2003084	4151	$153,000
			10A. TOTAL →	

PART II - BUDGET ANALYSIS CONSORTIUM

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL	$ 30,034				
2. FRINGE BENEFITS	6,007				
3. TRAVEL	4,200				
4. EQUIPMENT	— 0 —				
5. SUPPLIES	1,100				
6. CONTRACTUAL	247,300				
7. ~~CONSTRUCTION~~	0 NTP's AND PE's				
8. OTHER	1,859				
9. INDIRECT CHARGES	— 0 —				
10. TRAINEE COST/STIPEND	— 0 —				
11. INSTITUTIONAL ALLOWANCE	— 0 —				
12. TOTAL	$ 290,500	153,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

GPMD – ORIGINAL

(2) A decrease in total current funds revenues during any of the three years preceding the year in which the institution seeks designation as a developing institution.

(3) An excess of expenditures plus mandatory transfers over revenues in the unrestricted current funds during any two of the three years preceding the year in which the institution seeks designation as a developing institution. In this section the term "current funds" means the funds available for use in meeting current operations.

(f) The Commissioner considers an institution to be struggling and isolated for purposes of paragraph (b) of this section if the institution—

(1) Received a grant under this part in the fiscal year ending September 30, 1978; or

(2) Received a grant under the Advanced Institutional Development Program in a prior fiscal year for an award period with an original expiration date on or after June 30, 1979.

(20 U.S.C. 1053(a)(1)(D)(ii))

§ 169.18 Desire, potential, and reasonable effort.

(a) To be designated as a developing institution, an institution must possess the desire and potential to make a substantial and distinctive contribution to the higher education resources of the Nation. Such a contribution might, for example, be to provide access to a particular group of students who would not otherwise have access to an institution of higher education; or the institution may offer a particular set of academic programs that are not otherwise available to the types of students who comprise its student body.

(b) In addition, the institution must have taken concrete steps to improve its overall academic and administrative capacity over the past three years and, specifically, have made a reasonable effort to improve the quality of its administrative and instructional staffs and its student services.

(c) Except as provided in paragraph (e) of this section, the institution shall submit to the Commissioner, as part of its request for designation as a developing institution, a narrative describing—

(1) The mission and goals of the institution; and

(2) The tangible progress that the institution has made over the past three years to reach its specific goals, with special emphasis on activities carried out in the improvement of—

(i) Instructional staff;

(ii) Administrative staff; and

(iii) Student services.

(d) On the basis of the narrative, the Commissioner determines whether the institution meets the criteria of having the desire and potential of making a significant contribution to the higher educational resources of the Nation and has been making a reasonable effort to improve its instructional program, its administrative capacity, and its student services.

(e) The Commissioner considers any institution to have satisfied the requirements of this section if the institution—

(1) Received a grant under this part in the fiscal year ending September 30, 1978; or

(2) Received a grant under the Advanced Institutional Development Program in a prior fiscal year for an award period with an original expiration date on or after June 30, 1979.

(20 U.S.C. 1064)

Subpart C—Types of Awards

§ 169.21 Introduction.

The Commissioner makes three types of awards of Title III assistance:

(a) Cooperative arrangement grants.

(b) National Teaching Fellowships.

(c) Professor Emeritus Grants.

Each award is made from a single fiscal year's appropriation for Title III.

(20 U.S.C. 1064(b))

§ 169.22 Cooperative arrangements.

(a) A cooperative arrangement is one or more working relationships between a developing institution and other institutions of higher education, agencies, organizations, or business entities to assist the developing institution in implementing activities under a title III grant.

(b) There are two kinds of cooperative arrangements:

(1) *Bilateral arrangements.* Under a bilateral arrangement the developing institution draws upon the assistance and services of another higher educational institution, agency, organization, or business entity to strengthen its academic quality, or administrative, management, and financial capacity.

(2) *Consortium arrangements.* (i) Under a consortium arrangement two or more developing institutions agree to work with each other to strengthen themselves in the areas indicated or enter into an arrangement with an institution of higher education, agency, organization, or business entity to help a cluster of developing institutions carry out allowable activities.

(ii) One of the developing institutions participating in the consortium arrangement shall serve as the applicant and coordinator.

(iii) The institution coordinating the consortium arrangement is responsible for complying with the terms and conditions of the grant.

(iv) Every participating institution receiving services from a consortium arrangement shall be a developing institution and shall receive services in proportion to its share of the grant.

(v) The size of a consortium arrangement is limited to the number of institutions that can be effectively and efficiently served.

(20 U.S.C. 1064)

§ 169.23 National Teaching Fellowship grant.

(a) A National Teaching Fellowship grant is the second type of award made by the Commissioner under title III. A developing institution may request a National Teaching Fellowship either—

(1) As part of a cooperative arrangement; or

(2) Independent of any other type of award.

(b) The Commissioner awards a National Teaching Fellowship of one or two years' duration through a developing institution to—

(1) Junior faculty members from institutions other than the applicant institution; and

(2) Highly qualified graduate students—from institutions other than the applicant institution—who have at least a master's degree or related professional experience.

(c) A developing institution may have a National Teaching Fellow—

(1) Teach in an understaffed or new academic program; or

(2) Substitute for a faculty member released for further training or advanced study.

(d) A National Teaching Fellow shall serve as a full-time faculty member at the developing institution through which the award is made.

(e) Each National Teaching Fellow receives a stipend of $7,500 plus $400 per dependent for each academic year of teaching. A developing institution at which a National Teaching Fellow teaches may supplement the stipend with funds from sources other than title III.

(20 U.S.C. 1064)

§ 169.24 Professor Emeritus Grant.

(a) A Professor Emeritus Grant is the third type of award made by the Commissioner under title III. A developing institution may request a Professor Emeritus Grant either—

(1) As part of a cooperative arrangement; or

(2) Independent of any other type of award.

(b) The Commissioner awards a Professor Emeritus Grant through a developing institution to a professor who has retired from active service at an institution of higher education other than the grantee institution.

(c) A developing institution may have a Professor Emeritus—

STAFF TECHNICAL REVIEW

FY 1979
13.454

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Name of Applicant Institution Eastern Arizona College	Project Number 454AH90 235
Address 616 Church Street Safford, Arizona 85552	Level ☒ 2-Year ☐ 4-Year
Title III Coordinator: Wayne M. McGrath	Control ☒ Public ☐ Private
President: Wayne M. McGrath	Congressional District FOURTH — Region 9

Area Code	Telephone	Extension		Requested funds for how many years?
602	427-1133	231		469,065 3 yrs

Prior Title III Funding: $ —— (1978) $ 240,000 (1977) $ —— (1976)

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report X Yes ___ No Final Fiscal and Progress Report X Yes ___ No

1. Has the applicant been designated as a developing institution? ☐ No ☑ Yes

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	18	71	47	XXXX	118		X	272,056	2
Reader	20	60	43	XXXX	103		X	3,990	1
Reader	63	90	64	XXXX	154		X	128,367	1
Average		74	51		125			134,605	1
Staff	19	41	23		64	X			
Approve PTS		54	31	0	85		X	25,000	1

NIF's Requested 0 Number Approved ____ PE's Requested 0 Number Approved ____

Bilateral

This applicant ranked ____ by score of ____ __-year applicants.

This applicant ranked ____ by approval rank order of ____ __-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff	Date
Jo Ann Ballou	4/24/79

GPO 869-796

STAFF TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

FY 1979
13.454

Name of Applicant Institution Eastern Arizona College	Project Number 454AH90 235
Address	Level ☐ 2-Year ☐ 4-Year
Title III Coordinator:	Control ☐ Public ☐ Private
President:	Congressional District / Region

Area Code | Telephone | Extension [redacted] Requested funds for how many years?

Prior Title III Funding: $______ 1978 $______ 1977 $______ 1976

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report ___ Yes ___ No Final Fiscal and Progress Report ___ Yes ___ No

1. Has the applicant been designated as a developing institution? ☐ No ☐ Yes
   a. If no, applicant could not be funded.
   b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader				XXXX					
Reader				XXXX					
Reader				XXXX					
Staff									
App. No.	Points	74	51	20	145		X	100,000	1

WIF's Requested ______ Number Approved ______ FE's Requested ______ Number Approved ______

This applicant ranked ______ by score of ______ ___-year applicants.

This applicant ranked ______ by approval rank order of ______ ___-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff Peggy J. Whitehead
Sinclair V. Jeter

Date 6/21/79

GPO [illegible]

-10- Committee Review

EVALUATION CRITERIA	Reader Number
	PROJECT NUMBER 454AH90 235

ADDITIONAL COMMENTS

The Committee reviewed the ratings and comments of the 4 readers and concluded that insufficient weight was given to the three outside reviewers ratings. Therefore, we recommend 125 for 169.52 & 169.53. We further recommend 20 additional points because of the minorities served and the location of the college. We have also reassessed the amount recommended and concluded that $100,000 is more appropriate because it takes into account the recommendations of all 4 readers.

6/28/79 Peggy J. Whitehead

Karl C. H

GPO 907-700

Belton

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#): 454 AN 90,235
2. TYPE OF REQUEST (check one): ☒ N ☐ C ☐ S ☐ X ☐ R
3. GRANT NUMBER (if C, S, R request):
4. NAME OF APPLICANT: EASTERN ARIZONA COLLEGE
5. ENTITY NUMBER (EN): 1-86-600-0754-A1
6A. BUDGET PERIOD → BEGIN DATE: END DATE:
6B. PERFORMANCE PERIOD BEGIN DATE: END DATE:
6C. PROJECT LENGTH (months): 12

7. REPORTS	DUE DATES		
A. QUARTERLY			
B. SEMIANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL	✓	▨	▨

8. OE PROJECT OFFICER
NAME: Loretta A Hawrylyniak

9. GRANTEE'S PROJECT DIRECTOR
NAME: 602-428-1133 X:231
WAYNE M. McGRATH

E. EVALUATION ✓

10. FINANCIAL DATA

FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
1979	2003084	4151	125,000
		10A. TOTAL →	

3 years

PART II - BUDGET ANALYSIS BILATERAL

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL	331,425.				
2. FRINGE BENEFITS	62,736.				
3. TRAVEL	45,485.				
4. EQUIPMENT	5,789.				
5. SUPPLIES	4,400.				
6. CONTRACTUAL	—				
7. CONSTRUCTION	—				
8. OTHER	19,330.				
9. INDIRECT CHARGES	—				
10. TRAINEE COST/STIPEND	—				
11. INSTITUTIONAL ALLOWANCE	—				
X 12. TOTAL	469,165	125,000			

OE FORM 5370, 12/77 REPLACES OE FORM 5370, 2/77, WHICH IS OBSOLETE

GPMD – ORIGINAL

APPLICATION TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Catalog of Federal Domestic Assistance Number 13.454

APPLICANT

NAME OF APPLICANT INSTITUTION CATHOLIC U. OF P.R.	PROJECT NUMBER 464 AH90 -495
ADDRESS LAS AMERICAS AVENUE	Level __ 2-year ✓ 4-year Control __ Public ✓ Private
CITY, STATE, AND ZIP CODE PONCE, PUERTO RICO 00731	AMOUNT REQUESTED BY APPLICANT $1,563,147

Duration of Project: Requested funds for how many years? ☐ 1 ☒ 2 ☐ 3 ☐ 4 ☐ 5

1. Do you recommend Federal support? ☐ YES ☒ NO
2. If yes is checked, amount recommended. $________
3. If yes is checked, recommend award for how many years: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5
4. Total score of the evaluation criteria 29 TEL 20

Summary Comments:

PROPOSAL DOES NOT FOLLOW GUIDELINES. THERE IS NOT SUFFICIENT INFORMATION, FOR EVALUATION. BUDGET, FOR INSTANCE, HAS NOT BEEN FULLY RATIONALIZED.

Technical Reviewer

NAME OF READER (Print) LEONEL CAMPOS	ASSIGNED READER NUMBER 27
TITLE OF READER DIRECTOR, ALAS PROGRAM (CHICAGO STATE U.)	PHONE NUMBER (312) 995-2131
BUSINESS ADDRESS OF READER (COLLEGE) 95TH ST. AT KING DR	CITY, STATE, AND ZIP CODE CHICAGO, IL. 60628

I have reviewed the application in accordance with the "scope of work" that has been signed and returned to the Office of Education.

SIGNATURE Leonel Campos	DATE 2/28/79

OE FORM 1225, 4/78 (FM Control No. 38)

APPLICATION TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Catalog of Federal Domestic Assistance Number 13.454

APPLICANT

NAME OF APPLICANT INSTITUTION Catholic University of Puerto Rico	PROJECT NUMBER 464 AH90 495
ADDRESS Las Americas Ave.	Level __ 2-year X 4-year Control__ Public X Private
CITY, STATE, AND ZIP CODE Ponce Puerto Rico 00731	AMOUNT REQUESTED BY APPLICANT $1.563.147

Duration of Project: Requested funds for how many years? ☒ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

1. Do you recommend Federal support? ☐ YES ☒ NO
2. If yes is checked, amount recommended. $________
3. If yes is checked, recommend award for how many years: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5
4. Total score of the evaluation criteria 20 12

Summary Comments:

there is no real picture regarding how this institution is serving the students it has now. The reader does not know how many professional people work at the institution or where they work.

It does not seem reasonable that the school can add over 100 new people in one year. the result would be chaotic and do more damage than good.

Technical Reviewer

NAME OF READER (Print) MICHAEL P. SANCHEZ	ASSIGNED READER NUMBER 35
TITLE OF READER Asst. Dean for Student Affairs	PHONE NUMBER 303-598-3737 X355
BUSINESS ADDRESS OF READER (COLLEGE) Cragmor Rd	CITY, STATE, AND ZIP CODE Colo. Spgs, Colo. 80907

I have reviewed the application in accordance with the "scope of work" that has been signed and returned to the Office of Education.

SIGNATURE Michael P. Sanchez	DATE 2-27-79.

OE FORM 1335, 4/78 (FM Control No. 38)

APPLICATION TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Catalog of Federal Domestic Assistance Number 13.454

APPLICANT

NAME OF APPLICANT INSTITUTION Catholic University of Puerto Rico	PROJECT NUMBER 464 AH90 495
ADDRESS Las Americas	Level __ 2-year X 4-year Control __ Public X Private
CITY, STATE, AND ZIP CODE Ponce, Puerto Rico 00731	AMOUNT REQUESTED BY APPLICANT $2,819,477

Duration of Project: Requested funds for how many years? ☐ 1 ☒ 2 ☐ 3 ☐ 4 ☐ 5

1. Do you recommend Federal support? ☐ YES ☒ NO
2. If yes is checked, amount recommended. $ 0
3. If yes is checked, recommend award for how many years: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5
4. Total score of the evaluation criteria 74 41

Summary Comments: Amount requested on Form 1049-1 does not agree with budget information part VI. No of years does not agree The mission is vaguely stated, as well as the use of funds. Curriculum Development and Improvement is not only the prerogative of the faculty but also the responsibility. Quite frankly, the funds for NTF I would consider supporting, the proposal failed to identify how it would use the funds to increase the mobility of the students. The institution should make plans to evaluate what the accrediting association suggested in light of it's own commitments

Technical Reviewer

NAME OF READER (Print) Mary Ann Hickman	ASSIGNED READER NUMBER 67
TITLE OF READER Assist. Vice Chancellor Personnel	PHONE NUMBER 404-656-2272
BUSINESS ADDRESS OF READER (COLLEGE) 244 Washington St, S.W. Rm. 459	CITY, STATE, AND ZIP CODE Atlanta, Georgia 30334

have reviewed the application in accordance with the "scope of work" that has been signed and returned to the Office of Education.

SIGNATURE	DATE

OE FORM 1335, 4/78 (FM Control No. 38)

STAFF TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

FY 1979
13.454

Name of Applicant Institution: Catholic University of Puerto Rico

Project Number: 434AH90 445

Address: Postal Substation 6
Ponce, PR (00731)

Level: ☐ 2-Year ☒ 4-Year

Title III Coordinator: José L. Hernández

Control: ☐ Public ☒ Private

President: Francisco J. Carreras

Congressional District: N/A

Region: 2

Area Code	Telephone	Extension		Requested funds for how many years?
809	844-4150	138	[redacted]	1 year $1,563,147

*(Submitting; but not requested $2,819,427 for 2 years)

Prior Title III Funding: $ 279,500 (1978) $ 300,000 (1977) $ 250,000 (1976)

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report ___ Yes X No Final Fiscal and Progress Report X Yes ___ No

1. Has the applicant been designated as a developing institution? ☐ No ☒ Yes

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'d 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	76	12	8	XXXX	20	X		—	—
Reader	[illegible]	41	33	XXXX	74	X		—	—
Reader	27	20	9	XXXX	29	X		—	—
Avg.		24.3	17		41			—	—
Staff	5	83	64		147		X	250,000	1
									—
Appd		63	31	6	100	X		—	

7/30/79

NIF's Requested 12 Number Approved 0 | FE's Requested 4 Number Approved 0

This applicant ranked _____ by score of _____ ___-year applicants.

This applicant ranked _____ by approval rank order of _____ ___-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff: Bernice R. Retzlaff | Date: 4/24/79

It is inconceivable that an institution located in Puerto Rico and serving a poor Hispanic population that is the recipient of BSOG awards and come from poverty circumstances was not given any commensurate points. I, therefore award them 6 (bring the total) appropriate points to 100.

M. H. Brown
7/24/79

Rotzluff
10

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#) 454AH90495	2. TYPE OF REQUEST (check one) ☒ N ☐ C ☐ S ☐ R ☐ M	3. GRANT NUMBER (If C, S, M required)
4. NAME OF APPLICANT: Catholic University of Puerto Rico, PR (Ponce 00731)		5. ENTITY NUMBER (EN) 1660191965A2

6A. BUDGET PERIOD →	BEGIN DATE	END DATE	6B. PERFORMANCE PERIOD →	BEGIN DATE	END DATE	6C. PROJECT LENGTH (months) 12 Months

7. REPORTS	DUE DATES			
A. QUARTERLY				8. OE PROJECT OFFICER NAME Paul Carnell
B. SEMIANNUAL	✓		▨	9. GRANTEE'S PROJECT DIRECTOR
C. ANNUAL		▨	▨	NAME José L. Hernández 4675 (809) 844-4150 x 138
D. FINAL E. Evaluation	✓	▨	▨	

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	2003084	4151	
			/	
			/	
			10A. TOTAL →	

Bilateral PART II - BUDGET ANALYSIS Bilateral

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT		PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
	REQUESTED 2 years B	RECOMMENDED C			
1. PERSONNEL	1,858,480				
2. FRINGE BENEFITS	464,620				
3. TRAVEL	117,146				
4. EQUIPMENT	83,800				
5. SUPPLIES	76,321				
6. CONTRACTUAL					
12 MP's 7. CONSTRUCTION & Bu	(97,200) (60,000)				
8. OTHER	219,110				
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	2,819,477	230,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE GPMD – ORIGINAL

STAFF TECHNICAL REVIEW

FY 1979
13.454

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Name of Applicant Institution
Oakwood College - Bilateral

Project Number
454AH90 193

Address Oakwood Road
Huntsville, Alabama 35806

Level ☐ 2-Year ☒ 4-Year

Title III Coordinator: Ellen J. Anderson

Control ☐ Public ☒ Private

President: Calvin B. Rock

Congressional District 5

Region 4

Area Code 205

Telephone 837-0880

Extension

Requested funds for how many years? 3 yrs - 2,185,373

Prior Title III Funding: $ 937,000 1978 $ 1,002,100 1977 $ 375,000 1976

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report [✓ Yes] No
Final Fiscal and Progress Report [✓ Yes] No

1. Has the applicant been designated as a developing institution? ☐ No ☑ Yes
   a. If no, applicant could not be funded.
   b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	49	44	31	XXXX	75		✓	560,000	3
Reader	19	78	55	XXXX	133		✓	207,000	1
Reader	22	69	60	XXXX	129		✓	832,000	3
Average		64	49		113			533,000	2
Staff	17	62	51		113		✓	1,000,000	3
Appro	# pts	63	50	-0-	113		✓	800,000	3

NTF's Requested 3 Number Approved 1

PE's Requested 1 Number Approved 1

Bilateral

This applicant ranked ______ by score of ______ ___-year applicants.

This applicant ranked ______ by approval rank order of ______ __-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff
Jo Ann D. Barton

Date
4/25/79

GPO 837.770

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#) 454AH90193
2. TYPE OF REQUEST (check one) ☒N ☐C ☐S ☐K ☐M
3. GRANT NUMBER (If C, S, M request)
4. NAME OF APPLICANT OAKWOOD COLLEGE
5. ENTITY NUMBER (EN) 1-63-036-6652-A1
6A. BUDGET PERIOD → BEGIN DATE [illegible] END DATE [illegible]
6B. PERFORMANCE PERIOD → BEGIN DATE END DATE
6C. PROJECT LENGTH (months) 36

7. REPORTS	DUE DATES		
A. QUARTERLY			
B. SEMIANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL	✓	▨	▨

8. OE PROJECT OFFICER
NAME LORCHA WAWRZYNIAK

9. GRANTEE'S PROJECT DIRECTOR
NAME 205-837-0380
ELLEN J. ANDERSON

EVALUATION ✓

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	2003084	4151	1,262,000
			10A. TOTAL →	

PART II - BUDGET ANALYSIS

3 YEARS BILATERAL

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL	1,134,763				
2. FRINGE BENEFITS	203,963				
3. TRAVEL	112,399				
4. EQUIPMENT	235,638				
5. SUPPLIES	99,556				
⑥ CONTRACTUAL	90,032				
TPB 7. ~~CONSTRUCTION~~ 12,500	(72,900 - SNTF3				
8. OTHER	268,972				
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	2,155,323	1,262,000			

OE FORM 537", 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE GPMD – ORIGINAL

DURHAM COLLEGE

1979 - 1980

First Revision

No specific mention of MEDICAL LABORATORY TECHNICIAN program — compare with Second Revision.

II. PART III - INSTITUTIONAL MISSION

D. CURRENT INSTITUTIONAL MISSION AND GOALS

Durham College strives to meet its purpose by means of the following specific objectives:

* 1) Recruiting and maintaining a faculty dedicated to academic excellence and a desire/ability to work with disadvantaged youth.

* 2) Providing the strong academic support necessary for academic excellence and performance through library services, media, audio-visual and other support services.

* 3) Provide strong institutional support to the academic program through the establishment of efficient, dedicated administrative and executive officers.

* 4) Fostering student development through career, personal and social counseling, cultural activities, organizations and clubs, social and recreational activities.

5) Providing service to the local community by making available college facilities for meetings, voting, and cultural activities and providing voluntary assistance to local hospitals and clinics.

6) Providing continuing educational opportunities through the Evening College for personal development and/or Health Services career advancement.

HB

STAFF TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS FY 1979 13.454

Name of Applicant Institution Durham College	Project Number 434AH90 103
Address 3128 Fayetteville Street Durham, NC 27707	Level ☒ 2-Year ☐ 4-Year
Title III Coordinator: Samuel Evans	Control ☐ Public ☒ Private
President: Dr. James Hill	Congressional District 4 | Region 4
Area Code 919 | Telephone 683-2561 | Extension [redacted]	Requested funds for how many years? 498,195 for 1yr

Prior Title III Funding: $ 268,000 (1978) $ 275,000 (1977) $ 150,000 (1976)

G007804590 6-30

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report X Yes ___ No Final Fiscal and Progress Report X in 76 Yes X in 77 No

1. Has the applicant been designated as a developing institution? ☐ No ☒ Yes
   a. If no, applicant could not be funded.
   b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	55	53	49	XXXX	102		✓	118,961	1
Reader	13	72	58	XXXX	130		✓	236,039	1
Reader	2	67	62	XXXX	129		✓	280,000	1
Avg.		64	56		120			211,667	ONE
Staff	15	60	52		112		✓	320,000	1
[illegible]		63	57	21	141		✓	320,000	1

NTP's Requested 0 Number Approved ____ PE's Requested 0 Number Approved ____

This applicant ranked _____ by score of _____ ___-year applicants.

This applicant ranked _____ by approval rank order of _____ ___-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff: Carlos Stewart
Date: 4/24/79

DURHAM COLLEGE

1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT

orient properly the faculty and develop their abilities to serve the needs of Durham College students.

2) Provide an increased number of on-campus, in-service workshops to develop further the abilities of administrators and their staff.

3) Provide an increased number of off-campus opportunities (conventions, workshops, or seminars) for faculty to become aware of current developments and instructional innovations within their fields of specialization.

4) Provide an increased number of off-campus opportunities for administrators and staff personnel to become aware of current developments within their field or skill areas.

5) Enable an increased number of faculty to become members of professional organizations.

6) Provide the salaries necessary to attract and retain more faculty with earned doctorates.

7) Provide the salaries necessary to attract and retain faculty with more on-the-job experience and also with more experience teaching in their fields of specialization.

8) Provide more tuition assistance for faculty so that a greater number of faculty can pursue credits beyond the masters degree during the regular academic year and also during the summer period.

9) Enable faculty to conduct and publish research relevant to instructional techniques at Durham College.

10) Provide for the purchase of more faculty professional literature (research monographs, journals, and handbooks).

Durham College will implement the following procedures to achieve the

above objectives.

The Academic Council's subcommittee (composed of the AcademicDean, Assistant Academic Dean, and three faculty members) together with the President will plan and execute on-campus workshops for the faculty during the academic year; outside professionals may be asked to participate.

The Administrative Council (composed of the President, Academic Dean, Director of Institutional Advancement, Dean of Student Affairs, and the Director of Admissions and Financial Aid) will plan and execute on-campus workshops for administrators and their staff personnel.

The Academic Dean and the Assistant Academic Dean will motivate and assist faculty members in selecting appropriate professional organizations in which they wish to participate. Final approval of selections will be made by the president and the Business Office will submit membership dues to the approved organizations.

The Academic Dean will interview prospective faculty throughout the academic year and during the summer. He will actively seek out those with greater experience and with the attitudes and orientation appropriate for the special task of developing the skills and potential of disadvantaged black youth. He will be cognizant of the College's need for more instructors with credits beyond the masters level and for those with earned doctorates. The Assistant Academic Dean will assist the Dean in the evaluation of prospective faculty members. At the conclusion of the interview and evaluation process, the Academic Dean will recommend to the President those pro-

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT PROGRAM

finding and conclusions are utilized by faculty members to upgrade their methods of instructing Durham College students. The Dean will further assist in seeking publication of the research.

The Academic Dean will recommend to the subcommittee the purchase of faculty professional Health care literature which he deems desirable for faculty development. The subcommittee will make recommendations for purchases and the President will give approval. The Dean will house the literature in his office and see to it that faculty make use of it by checking it out on a regular and frequent basis.

The Academic Dean will supervise and monitor progress toward achievement of the staff development objectives. He will assess progress toward the accomplishment of each objective by referring to a step-by-step time schedule of events which, if adhered to, will assure accomplishment of each objective according to its corresponding PEM. The Academic Dean will report monthly to the Academic Council's subcommittee and the Administrative Council on the degree of process achieved at that time one each of the ten objectives. The subcommittee and the Administrative Council will make recommendations "that will" concerning the rate of progress and any changes therein. The President's decision will be final and the Dean will execute accordingly.

DURHAM COLLEGE

1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

Institutional Advancement efforts are directed toward fund raising, alumni administration, government relations, institutional relations, and community relations.

Support is requested for the activities of IA to enable Durham College to achieve greater financial and human support from its constituences, so that it may provide its students with the environment conducive to intellectual and social growth.

Fund raising is an essential activity for the private college. Each year the pressure is greater on Durham College to locate and obtain funds from foundations, corporations and the general public. The forces of rising costs for services and supplies coupled with inflation causes concern for the survival of all private institutions. Therefore, the College must devote a portion of its resources to the quest for additional resources.

One of the most cherished of resources for institutions of higher learning is the alumni. Alumni, however, do not automatically become supporters of their alma mater upon graduation. They must be cultivated with regular communications and involvement that challenges them to give their resources of time, effort, influence and money. The College therefore must provide personnel and funds for the cultivation of alumni, and maintaining an ongoing program of involvement.

Maintaining relations with Federal, state and local Health care agencies which benefit the College with grants and other support, is essential to the life of Durham College. Proposal opportunities must be researched and

DURHAM COLLEGE

1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

proposals written and submitted to these sources. The college therefore must provide personnel and funds for maintaining these relations.

Relations within the college among its various parts is facilitated through effective communications. Without easy and frequent communications, parts tend to become isolated and even alienated from each other. To insure that relations among departments and various levels of personnel are maintained and enhanced, it is essential that the college devote resources toward improving institutional relations. To maintain positive relations with the general public, it is necessary to publicize internal events that are noteworthy. The more positive the news which is generated by an institution, the more likely it is that public support will ensue. The college therefore believes that resources should be devoted to maintaining internal and external relations that will produce positive effects.

Specific objectives to accomplish institutional goals mentioned above:

1) The College will increase the amount of funds realized annually from external sources from $85,000 to $150,000.
2) The Collegewill increase participation among alumni by five (5) per cent, realizing an additional 90 persons participating.
3) The College will increase the number of grant proposals prepared submitted to Federal agencies from three to six.
4) The College will prepare and submit two grant proposals to state agencies requesting funding.
5) The College will increase the number of proposals prepared and submitted to private foundations from 50 to 100.
6) The College will improve the quality of communications among its various parts through the establishment of regular and frequent publication.

DURHAM COLLEGE
1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

7) The College will increase the quality of its community relations by increasing the number of news releases to the media from 56 to 100.

8) The College will increase the skill and effectiveness of IA staff through professional workshops and conferences. Staff will increase the number of annual professional growth opportunities taken from four to nine.

9) The College will revise the Long Range Planning document by December 31, 1979 to reflect current projections.

Publications and community affairs will be the responsibility of the director of IA. Advertising and publications will be prepared in conjunction with the department chairpersons requesting these services. Such items as academic catalog, yearbooks, brochures, and on-campus newsletters will be prepared through this office. External relations involving Media and participation of college representatives in community affairs will be coordinated through the IA office. Two news releases per week will be submitted to the media.

DURHAM COLLEGE

1979 - 1980

Second Revision

MANY REFERENCES TO MEDICAL LABORATORY TECH. PROGRAM INSERTED

COMPARE WITH FIRST REVISION

II. PART III - INSTITUTIONAL MISSION

D. CURRENT INSTITUTIONAL MISSION AND GOALS

Durham College strives to meet its purpose by means of the following specific objectives.

* 1) Recruiting and maintaining a qualified Health education faculty dedicated to academic excellence and a desire and ability to work with disadvantaged youth.

* 2) Providing the strong academic support necessary for academic excellence and performance, in the Allied Health Services with particular emphasis on medical laboratory technicians, through library services, media, audio-visual and other academic support services.

* 3) Provide strong institutional support to the medical laboratory technician academic program through the establishment of efficient, dedicated administrative and executive officers.

* 4) Fostering the development of MLT students through career, personal and social counseling, cultural activities, organizations and clubs, social and recreational activities.

5) Providing service to the local community by making available college facilities for meetings, voting, and cultural activities and providing voluntary assistance to local hospotals and health clinics.

6) Providing continuing education opportunities in MLT through the Evening College for professional development and/or Health Services career advancement.

The College program in medical lab technician is accredited by the Accrediting Bureau for health education schools. In its accreditation, the totality of the College's operation is reviewed and evaluated. The areas of instructions and faculty qualification, library services, student services, admission procedures and policies, business office and financial policies are all evaluated in the light of the support they provide in the successful operation of a quality Medical Laboratory technician program. Thus the accreditation of the MLT program as an area of concentration also provides direct accreditation of those normal and regular institutional functions that must be present and operative to support the specialized

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT

orient properly the medical laboratory-health sciences faculty and develop their abilities to serve the needs of Durham College students.

2) Provide an increased number of on-campus, in-service workshops to develop further the abilities of medical laboratory-health sciences administrators and their staffs.

3) Provide an increased number of off-campus opportunities (conventions, workshops, or seminars) for medical laboratory-health sciences faculty to become aware of current developments and instructional innovations within their fields of specialization.

4) Provide an increased number of off-campus opportunities for medical laboratory-health sciences administrators and staff personnel to become aware of current developments within their fields or skill areas.

5) Enable an increased number of medical laboratory-health sciences faculty to become members of professional organizations.

Salary scale?

6) Provide the salaries necessary to attract and retain more medical laboratory-health sciences faculty with earned doctorates.

7) Provide the salaries necessary to attract and retain medical laboratory-health sciences faculty with more on-the-job experience and also with more experience teaching in their fields of specialization.

? 8) Provide more tuition assistance so that a greater number of medical laboratory-health sciences faculty can pursue credits beyond the bachelors degree during the regular academic year and also during the summer.

9) Enable medical laboratory-health sciences faculty to conduct and publish research relevant to instructional techniques at Durham Colllege.

10) Provide for the purchase of more faculty professional literature (scientific research mongraphs, journals, and handbooks).

Durham College will implement the following procedures to achieve the

DURHAM COLLEGE

1979 - 1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT

above objectives.

The Academic Council's subcommittee (composed of the Academic Dean, Assistant Academic Dean, and three faculty members) together with the President will plan and execute on-campus workshops for the medical laboratory-health sciences faculty during the academic year; outside professionals may be asked to participate.

The Administrative Council (composed of the President, Academic Dean, Director of Institutional Advancement, Dean of Student Affairs, and the Director of Admissions and Financial aid) will plan and execute on-campus workshops for medical laboratory-health sciences administrators and their staff personnel.

The Academic Dean and the Assistant Academic Dean will encourage and assist medical laboratory-health sciences faculty members in selecting appropriate professional organizations in which they wish to participate. Final approval of selections will be made by the President and the Business Office will submit membership dues to the approved organizations.

The Academic Dean will interview prospective medical laboratory-health sciences faculty through out the academic year and during the summer. He will actively seek out those with greater experience and with the attitudes and orientation appropriate for the special task of developing the skills and potential of disadvantaged black youth. He will be cognizant of the College's need for more instructors with credits beyond the masters level and for those with earned doctorates. The Assistant Academic Dean will assist the Dean in the evaluation of prospective faculty members. At the conclusion of the

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT PROGRAM

to it that the research finds and conclusions are utilised by faculty members to upgrade their methods of instructing Durham College medical laboratory-health seciences students. The Dean will further assist in seeking publication of the research.

The Academic Dean will recommend to the subcommittee the purchase of faculty professional literature which he deems desirable for faculty development. The subcommitte will make recommendations for purchases and the President will give final approval. The Dean will house the literature in his office and see to it that faculty make use of it by checking it out on a regular and frequent basis.

The Academic Dean will supervise and monitor progress toward achievement of the medical laboratory-health sciences staff development objectives. He will assess progress toward the accomplishment of each objective by referring to a step-by-step time schedule of events which is adhered to will assure accomplihsment of each objective according to its corresponding PEM. The Academic Dean will report monthly to the Academic Council's subcommittee and the Administrative Council on the degree of progress achieved at that time on each of the ten objectives. The subcommittee and the Administrative Council will make recommendations at will concerning the rate of progress and any changes therein. The President's recommendations will be decisive and the Dean will execute accordingly.

DURHAM COLLEGE

1979 - 1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

Institutional Advancement efforts are directed toward fund raising, alumni administration, government relations, institutional relations, and community relations in order to maintain its medical laboratory-health sciences programs.

Support is requested for the activities of IA to enable Durham College to achieve greater financial and human support from its constituencies, so that it may provide its students with the environment and equipment conducive to intellectual and social growth.

Fund raising is an essential activity for the private college. Each year the pressure is greater on Durham College to locate and obtain funds from foundations, corporations and the general public. The forces of rising costs for services and supplies coupled with inflation causes concern for the survival of all private institutions. Therefore, the college must devote a portion of its resources to the quest for additional resources.

One of the most cherished of resources for institutions of higher learning is the alumni. Alumni, however, do not automatically become supporters of their alma mater upon graduation. They must be cultivated with regular communications and involvement that challenges them to give their resources of time, effort, influence and money. The college therefore must provide personnel and funds for the cultivation of its alumni, and maintaining an ongoing program of involvement.

Maintaining relations with Federal, state, and local agencies which benefit the college with grants and other support, is essential to the life of Durham College. Medical laboratory-health sciences proposal opportunities must be researched and proposals written and submitted to these sources. The

DURHAM COLLEGE

1979 - 1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

college therefore must provide personnel and funds for maintaining these relations.

Relations within the college among its various parts its facilitated through effective communications. Without easy and frequent communications, parts tend to become isolated and even alienated from each other. To insure that relations with the medical laboratory-health sciences department and various levels of personnel are maintained and enhanced, it is essential that the college devote resources for improving institutional relations. To maintain positive relations with the general public, it is necessary to publicize internal events that are noteworthy. The more positive news which is generated by an institution, the more likely it is that public support will ensue. The college therefore believes that resources should be devoted to maintaining internal and extenal relations that will produce positive effects.

Specific objectives to accomplish institutional goals mentioned above:

1) The College will increase the amount of funds raised annually for medical laboratory-health sciences programs from external sources from $85,000 to $150,000.
2) The College will increase participation among alumni by five (5) per cent, realizing an additional 90 persons participating.
3) The College will increase the number of grant medical laboratory-health sciences proposals prepared and submitted to Federal agencies from three to six.
4) The College will prepare and submit two grant proposals to state agencies requesting funding.
5) The College will increase the number of science proposals prepared and submitted to private foundations from 56 to 100.
6) The College will improve the quality of communications among its various parts through the establishment of regular and frequent publications.

DURHAM COLLEGE

1979 - 1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

7) The College will increase the quality of its community relations by increasing the number of news releases to the media from 36 to 100.
8) The College will increase the skill and effectiveness of IA staff through professional workshops and conferences. Staff will increase the number of annual professional growth opportunities taken from four to nine.
9) The College will revise the Long Range Planning document by December 31, 1979, to reflect current projections.

Medical laboratory-health sciences publications and community affairs will be the responsibility of the director of IA. Advertising and publications will be prepared in conjunction with the department chairpersons requesting these services. Such items as academic catalog, yearbooks, brochures, and on-campus newsletters which promote the medical laboratory-health sciences programs will be prepared through this office. External relations involving media and participation of college representatives in community affairs will be coordinated through the IA office. Two news release per week will be submitted to the media.

From LaMorgi

MEMORANDUM

DEPARTMENT OF HEALTH EDUCATION AND WELFARE
OFFICE OF EDUCATION

TO
Leslie W. Ross, Chief, IEB
Joseph M. Hardman, Chief, CES
Voncille McDonald, Acting Chief, OSES
Ronald Pugsley, Chief, AAEB

DATE September 28, 1979

FROM : Director
Division of Eligibility and Agency Evaluation

SUBJECT POLICY: - Eligibility Status of Complex Institutions Which Have Only Specialized Accreditation for Certain Programs

1. We have received increasing numbers of eligibility applications for designation as "institutions of higher education" or "vocational schools" from educational entities which are complex or multipurpose institutions that lack accreditation for all the programs they offer. Frequently these entities, although lacking institutional accreditation, do offer one or two or a few programs which have attained specialized or programmatic accreditation.

2. a. In all cases where a complex or multipurpose educational entity seeks eligibility, but is not accredited, yet has some accredited programs, the scope of the eligibility status conferred shall not include programs of institutional support, but will be limited to programs of student assistance. In these instances, the complex multipurpose institution must have comprehensive institutional accreditation before it can be cited as eligible to apply for programs of institutional aid or support.

b. For example, a multipurpose complex institution lacking comprehensive institutional accreditation will not be cited eligible to apply for institutional support such as:

Title I - Community Service and Continuing Education Programs
Title II - College Library Programs: A. Resources, B. Training
→ Title III - Strengthening Developing Institutions
Title VI A - Improvement of Undergraduate Instruction - Equipment
Title VII - Academic Facilities - A, B, and C
Title VIII - Cooperative Education Program
Title IX - Graduate Programs and Fellowships - A, B, C, and D
Title XI - Law School Clinical Experience Program

However, such institutions would be cited as eligible to apply for programs of student financial assistance, such as those provided by Title IV of the Higher Education Act.

3. This ruling does not apply to free-standing, predominantly single purpose institutions, such as law schools, art schools, or other institutions which hold specialized institutional-programmatic accreditation for the educational offering of the institution.

All questions concerning this policy should be referred to me.

John R. Proffitt

John R. Proffitt

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION

TO : William D. Yancey, Acting Chief
HEW Federal Assistance Financing Branch
Through: William Ward, Director
Finance Division, OM/OE

DATE: SEP 14 1979

FROM : Deputy Commissioner for
Higher and Continuing Education

SUBJECT: Request to Withhold Further Release of Funds - Durham College
Durham, North Carolina
ENT #1560518117A1

This memorandum requests that the authority of the above named institution to draw further funds be withheld, effective immediately, based upon the adverse eligibility action regarding this institution until such time as you are notified by the appropriate program officers regarding changes in the funding allocations to this institution. Accredited status has been withdrawn except for the medical laboratory technician program.

Alfred L. Moye

Alfred L. Moye

cc: Director, Division of Eligibility and
Agency Evaluation, BHCE
Director, Division of Program Operations, BSFA
Chief, Campus and State Grant Branch, DPO, BSFA
Chief, Basic Grant Branch, DPO, BSFA
Director, Division of Compliance, BSFA
Chief, Audit Review Branch, DCPR, BSFA
Chief, Program Review Section, PRB, DCPR, BSFA
Regional Administrator, SFA - Region IV
Deputy Commissioner for Management
Director, Finance Division, OM
Chief, Audit Liaison and Coordination Staff, OEDC-SS, OC
Higher Education Branch, ED, OGC
Assistant Director, Division of University and
Nonprofit Audits, HEWAA, OIG

Prepared by Fred H. Sellers, Ext. 52943

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#) 454 AH 90064
2. TYPE OF REQUEST (check one) ☒G ☐C ☐S ☐R ☐M
3. GRANT NUMBER (If C, S, M request)
4. NAME OF APPLICANT Medgar Evers College, Brooklyn, New York 11319
5. ENTITY NUMBER (EN) 53196A1
6A. BUDGET PERIOD → BEGIN DATE END DATE
6B. PERFORMANCE PERIOD → BEGIN DATE END DATE
6C. PROJECT LENGTH (months) 12

7. REPORTS	DUE DATES		
A. QUARTERLY			
B. SEMIANNUAL	✓		▨
C. ANNUAL	✓	▨	▨
D. FINAL	✓	▨	▨

8. OE PROJECT OFFICER
NAME Sinclair U. Jeter
(202) 245-9661

9. GRANTEE'S PROJECT DIRECTOR
NAME Dr. Henry Olsen
(212) 735-1767

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	FY1979	2003084	41.57	
			10A. TOTAL →	

PART II - BUDGET ANALYSIS

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B (3415)	AMOUNT RECOMMENDED C (1415)	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL	$1,625,197				
2. FRINGE BENEFITS	370,055				
3. TRAVEL	15,595				
4. EQUIPMENT	170,530				
5. SUPPLIES	33,262				
6. CONTRACTUAL	87,650				
7. CONSTRUCTION					
8. OTHER	13,900				
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	$2,320,159	$400,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE GPMD-O

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS | **PART III PROGRAM DOCUMENTATION**

PROJECT OFFICER RECOMMENDATIONS FOR BUDGET REVISIONS AND MINOR WORK SCOPE ADJUSTMENTS *(The Project Officer should include recommended budget revisions with complete rationale which are (1) in accordance with the program regulations and evaluation criteria; (2) in accordance with the reviewers' and Staff Technical Review Summary comments, and (3) would not affect the application's ranking. In addition, the Project Officer may raise any questions or issues necessary for the Grants Specialist to conduct negotiations)*

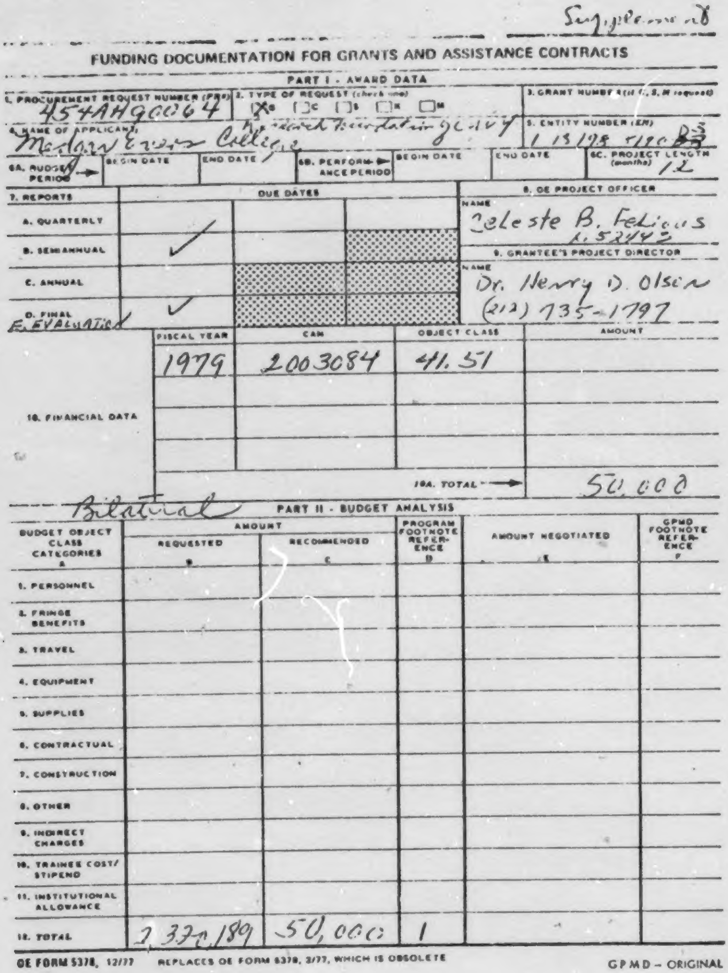
(1) Computer Assisted Instruction –	$ 70,000
(2) Reading Laboratory –	50,000
(3) Writing Laboratory –	50,000
(4) Liberal Arts Studies –	75,000
(5) Institutional Advancement –	45,000
(6) Institutional Research –	40,000
(7) Faculty Development –	25,000
(8) Auto-Tutorial Laboratory –	20,000
(9) Title III Coordination –	25,000
	$ 400,000

8/3/79
DATE

SIGNATURE OF OE PROJECT OFFICER

OE FORM 5378-1, 12/77

GPMP



Supplemental

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#) 454AHG0064
2. TYPE OF REQUEST (check one) ☒ N ☐ C ☐ S ☐ R ☐ M
Research Training 9C-1V4
3. GRANT NUMBER (if C, S, M request)
4. NAME OF APPLICANT Medgar Evers College
5. ENTITY NUMBER (EN) 1 13198 5190 B3
6A. BUDGET PERIOD → BEGIN DATE END DATE
6B. PERFORMANCE PERIOD → BEGIN DATE END DATE
6C. PROJECT LENGTH (months) 12

7. REPORTS	DUE DATES		
A. QUARTERLY			
B. SEMIANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL E. EVALUATION	✓	▨	▨

8. OE PROJECT OFFICER
NAME Celeste B. Felicus
1, 52442

9. GRANTEE'S PROJECT DIRECTOR
NAME Dr. Henry D. Olsen
(212) 735-1797

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	2003084	41.51	
			10A. TOTAL →	50,000

Bilateral

PART II - BUDGET ANALYSIS

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL					
2. FRINGE BENEFITS					
3. TRAVEL					
4. EQUIPMENT					
5. SUPPLIES					
6. CONTRACTUAL					
7. CONSTRUCTION					
8. OTHER					
9. INDIRECT CHARGES					
10. TRAINEE COST/ STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	2,370,189	50,000	1		

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

GPMD - ORIGINAL

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS | **PART III - PROGRAM DOCUMENTATION**

PROJECT OFFICER RECOMMENDATIONS FOR BUDGET REVISIONS AND MINOR WORK SCOPE ADJUSTMENTS *(The Project Officer should include recommended budget revisions with complete rationale which are (1) in accordance with the program regulations and evaluation criteria; (2) in accordance with the reviewers' and Staff Technical Review Summary comments, and (3) would not affect the application's ranking. In addition, the Project Officer may raise any questions or issues necessary for the Grants Specialist to conduct negotiations)*

1) This is an additional amount to be added to the Liberal Arts Studies.

current bal. $83,491
new bal. $133,491

Justification

The $50,000 will be used to include a Coop Education component as part of the Liberal Arts Studies. The initial funding of $400,000 was not adequate to cover expenditures for the Coop Education component.

9/25/79 — Celeste B. Felicious

DATE — SIGNATURE OF OE PROJECT OFFICER

OE FORM 5378-1, 12/77

GPMD

DHP

STAFF TECHNICAL REVIEW

FY 1979
13.454

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Project Number
454AH90 064

Name of Applicant Institution
Medgar Evers College

Level ☐ 2-Year ☒ 4-Year

Address 1150 Carroll Street
Brooklyn, New York 11225

Control ☒ Public ☐ Private

Congressional District

Region

Title III Coordinator: Dr Henry Olsen

President: Dr [illegible]

Area Code | Telephone | Extension

Requested funds for how many years? 2,320,187 (3 yrs.)

Prior Title III Funding: $ 373,500 (1978) $ 400,000 (1977) $ 100,000 (1976)

If funded in FY 1977 or 1976, were satisfactory reports submitted? Final Fiscal and Progress Report ___ Yes X No in 76 and in 77

Evaluation Report ___ Yes ✓* No *77-78

1. Has the applicant been designated as a developing institution? ☐ No ☑ Yes

a. If no, applicant could not be funded.

b. If yes, reviewers recommendations follow:

Reviewers Recommendations	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	85	80	56	XXXX	136		/	$539,329.00	3
Reader	2	71	62	XXXX	135		/	$1,6[illegible].00	3
Reader	9	31	71	XXXX	142		/	$1,751,255.00	3
Avg.		74	63		127			1,316,115	3
Staff	9-1-12	58	42	5	100		1	[illegible]	1
Appl		68	56		124		✓	170,000	1

WTF's Requested 0 Number Approved ______

PE's Requested 0 Number Approved ______

This applicant ranked ______ by score of ______ ___-year applicants.

This applicant ranked ______ by approval rank order of ______ ___-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff Celeste B. Felicia

Date 4/24/79

GPO 937-770

STAFF TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

FY 1979
13.454

Name of Applicant Institution Dabney S. Lancaster Community College	Project Number 454AH90 357
Address Clifton Forge, Va. 25422	Level ☒ 2-Year ☐ 4-Year
Title III Coordinator: Same	Control ☒ Public ☐ Private
President: Dr. John F. Backels	Congressional District 6 | Region 3

Area Code	Telephone	Extension		Requested funds for how many years?
703	862-4246			180,800 1 year

Prior Title III Funding: $ 0 (1978) $ 0 (1977) $ 0 (1976)

If funded in FY 1977 or 1976, were satisfactory reports submitted? NA

Evaluation Report X Yes ___ No Final Fiscal and Progress Report ___ Yes ___ No

1. Has the applicant been designated as a developing institution? ☐ No ☒ Yes
   a. If no, applicant could not be funded.
   b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	53	56	39	XXXX	95		✓	38,351	1
Reader	56	44	54	XXXX	98		✓	35,[illegible]	1
Reader	22	42	24	XXXX	66		✓	36,100	1
Average		47.33	39		XXXX			43,156	1
Staff	1-5	74	51		125		✓	100,000	1
[illegible]		57	37		96		X	100,000	1

JTF's Requested 2 Number Approved 3 PE's Requested 0 Number Approved 0

This applicant ranked _____ by score of _____ ___-year applicants. put in 8.10

This applicant ranked _____ by approval rank order of _____ ___-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff Bernice R. Ratliff Date 4/24/79

#357

[illegible] outside readers' points, [illegible] original, vary from the [illegible] as prepared by the Statistical Team.

1. Three readers rated 11-9.52 over 51 points. Staff rated 16/1.52 over 50 points.

1. The budgets did not indicate cost-sharing; however some cost-sharing was evident in the narratives.

4. The college is an open-door, low-cost institution.

3. Institution needs planning assistance. Proposal indicates a lack of expertise in this area.

The readers did not display consistency in amount of recommendations.

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

FY 1979
13.454

ame of Applicant Institution
bney S Lancaster Com. C.H.

Project Number
454AH90 357 304

ddress

Level ☒ 2-Year ☐ 4-Year

itle III
oordinator:

Control ☒ Public ☐ Private

resident:

Congressional District | Region

rea Code | Telephone | Extension | Requested funds for how many years?

rior Title III Funding: $______ 1978 $______ 1977 $______ 1976

f funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report ___ Yes ___ No Final Fiscal and Progress Report ___ Yes ___ No

. Has the applicant been designated as a developing institution? ☐ No ☐ Yes

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

eviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
eader				XXXX					
eader				XXXX					
eader				XXXX					
taff									
p.#	Points	59	37	15	111		X	100,000	1

F's Requested ______ Number Approved ______ | FE's Requested ______ Number Approved __

is applicant ranked ______ by score of ______ ___-year applicants.

is applicant ranked ______ by approval rank order of ______ __-year applicants.

mments must include a justification if the staff recommendation varies significantly from
e reviews by field readers.

Peggy J. Whitehead

gnature of Staff

Date 6/28/79

APPLICATION TECHNICAL REVIEW

WORK COPY

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Catalog of Federal Domestic Assistance Number 13.454

APPLICANT

NAME OF APPLICANT INSTITUTION Canisius College

PROJECT NUMBER 454 AH90 026

ADDRESS 2001 Main Street

Level ___ 2-year X 4-yea

Control ___ Public X Priva

CITY, STATE, AND ZIP CODE Buffalo, New York 14208

AMOUNT REQUESTED BY APPLICANT $ 1,956,451

Duration of Project: Requested funds for how many years? ☐ 1 ☐ 2 ☒ 3 ☐ 4 ☐ 5

1. Do you recommend Federal support? ☐ YES ☒ NO

2. If yes is checked, amount recommended. $________

3. If yes is checked, recommend award for how many years: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

4. Total score of the evaluation criteria 71 + 53 = 124

Summary Comments:

The application presents a clearly defined program to strengthen the institution, or, rather, to expand its program. However, the data presented also indicates that the institution has proposed beyond the crucial need for funds for survival.
P. 31; P. 49. P. 78. P. 148.

Technical Reviewer

NAME OF READER (Print) Bernice R. Retzlaff

ASSIGNED READER NUMBER 9-1-5

TITLE OF READER Education Program Specialist

PHONE NUMBER 245-7091

BUSINESS ADDRESS OF READER (COLLEGE) O.E.

CITY, STATE, AND ZIP CODE Wash., DC. 20202

I have reviewed the application in accordance with the "scope of work" that has been signed and returned to the Office of Education.

SIGNATURE Bernice R. Retzlaff

DATE 4/6/79

OE FORM 1335, 4/78 (FM Control No. 250)

Retzlaff

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#): 454AH90026
2. TYPE OF REQUEST (check one): ☒ N ☐ C ☐ S ☐ K ☐ M
3. GRANT NUMBER (If C, S, M request):
4. NAME OF APPLICANT: Canisius College, NY
5. ENTITY NUMBER (EN): 1160743942A1
6A. BUDGET PERIOD → BEGIN DATE: END DATE:
6B. PERFORMANCE PERIOD → BEGIN DATE: END DATE:
6C. PROJECT LENGTH (months): 12 Months

7. REPORTS	DUE DATES		
A. QUARTERLY			
B. SEMIANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL & Evaluation	✓	▨	▨

8. OE PROJECT OFFICER
NAME: Paul Cornell

9. GRANTEE'S PROJECT DIRECTOR
NAME: Mr. Griffith Jones
(716) 883-7000 x ~~344~~ 566

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	2003084	4151	
			10A. TOTAL →	

PART II - BUDGET ANALYSIS

Bilateral Bilateral

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT		PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
	REQUESTED 3 years B	RECOMMENDED C			
1. PERSONNEL	1,171,145				
2. FRINGE BENEFITS	166,305				
3. TRAVEL	86,850				
4. EQUIPMENT	170,712				
5. SUPPLIES	93,050				
6. CONTRACTUAL	177,200				
~~7. CONSTRUCTION~~ 5 yrs	(37,500)				
8. OTHER	91,039				
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	1,956,301	380,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

GPMD – ORIGINAL

STAFF TECHNICAL REVIEW

FY 1979
13.454

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Name of Applicant Institution Canisius College	Project Number 454AM90 026
Address 2001 Main Street Buffalo New York 14208	Level ☐ 2-Year ☒ 4-Year
Title III Coordinator: Mr. Griffith Jones	Control ☐ Public ☒ Private
President: Rev. James M. Demske, S.J.	Congressional District 37 | Region 2

Area Code	Telephone	Extension	[redacted]	Requested funds for how many years?
716	883-7000	314		$1,956,451 3 years

Prior Title III Funding: $ AIDP funded in 1975 for $1,525,000
1978 1977 1976

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report X Yes ___ No   Final Fiscal and Progress Report X Yes ___ No

1. Has the applicant been designated as a developing institution? ☐ No ☒ Yes

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	9	75	30	XXXX	105	X			
Reader	90	82	67	XXXX	149		X	865,000	3
Reader	99	77	48	XXXX	125		X	700,000	3
Avg		78	48.33		126			524,667	
Staff	4-5	71	53		124	X		0	
Approp. # pts		~~63~~ 75	~~83~~ 53 staff		~~117~~ 128	X		0	

7/30/79

NIP's Requested 5 Number Approved 0   PE's Requested 0 Number Approved 0

* Readers' comments pointed out the lack of planning apart from present AIDP grant program.

This applicant ranked _____ by score of _____ __-year applicants.

This applicant ranked _____ by approval rank order of _____ __-year applicants.

*Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff	Date
Bernice R. Rettoff	4/27/79

GPO

9/3/79

To: Arthur Steward

From: Loretta A. Wanzyneik

Subject: Elizabeth City State University
#454 AH 90190

This proposal was on the slate for a period of two years and a funding level of $1,117,000. Rosemary Wood negotiated a three-year grant for $1,005,000. The coordinator, Mr. Swimpson, phoned a program contact and was told that he had a two-year grant. He now wishes to know for how long and at what level he is to be funded.

I discussed the matter with Dr. Brantley. He said that the institution is not to be funded at a level below what it received last year. Last year Elizabeth City received $558,000 for its bilateral and $209,000 for its consortium. To fund the institution at this level, it will mean reinstating the total amount on the slate and reducing the length of the grant.

from three to two years.

The proposed levels of funding for two years are:

*1. Admissions and Recruitment	40,000
****2. Curriculum Development	500,000
3. Physics Development	100,000
4. Student Services	170,000
5. Executive management	147,000
**6. Public Relations	60,000
***7. Title III coordination	100,000
Total:	$1,117 000

* Funds to be used for training only.

** Funds to be used for training only.

*** Funds to be used for Title III coordination only. Federal Grants Officer cannot be supported, except for training and establishing procedures as part of overall administrative improvement.

**** Teaching assistants cannot be students.

N.B. Because of time taken to try to resolve the level of funding for this grant, the coordinator will need an extension on the due date for the revised plan of operation.

9-5-79 called Mr Swimpson

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PRN) 454AH90190
2. TYPE OF REQUEST (check one) ☐B ☐C ☐D ☐K ☐M
3. GRANT NUMBER (if C, D, M required)
5. ENTITY NUMBER (EN) 1566000414A1
4. NAME OF APPLICANT Elizabeth City State University
6A. BUDGET PERIOD → BEGIN DATE END DATE
6B. PERFORMANCE PERIOD → BEGIN DATE END DATE
6C. PROJECT LENGTH (months) 24 3 years 5 years
8. OE PROJECT OFFICER NAME DR KARL HELMS
9. GRANTEE'S PROJECT DIRECTOR NAME James E. Swimpson (919) 335-0551 EXT 264

7. REPORTS		DUE DATES	
A. QUARTERLY			▨
B. SEMIANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL	✓	▨	▨

E. Evaluation

10. FINANCIAL DATA

FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
1979	2003084	4151	
		10A. TOTAL →	

PART II - BUDGET ANALYSIS

Bilateral

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
	• 5 yrs				
1. PERSONNEL	3,048,589				
2. FRINGE BENEFITS	589,263				
3. TRAVEL	114,000				
4. EQUIPMENT	204,000				
5. SUPPLIES	140,000				
6. CONTRACTUAL	226,500				
7. CONSTRUCTION NTF-10	(81,000)				
8. OTHER	165,000				
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE				1,117,000	
12. TOTAL	4,536,268	1,117,000		$1,005,000	

GPMD – ORIGINAL

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

Additional Submissions of Frederick A. Will

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
BUREAU OF STUDENT FINANCIAL ASSISTANCE
WASHINGTON, D.C. 20202

5 August, 1979

Dr. Bernard S. Smith
Assistant to the President/SDIP
Morris Brown College
643 Martin Luther King Jr. Dr., N.W.
Atlanta, Georgia 30314

Dear Dr. Smith:

We are in receipt of your letter of July 30, 1979. This letter is to correct misperceptions of the July 27, 1979 meeting and to address the issue of your request for an extension of Grant number G007402513.

At the July 27 meeting no final decision could have been made to extend this grant, as the Grant and Procurement Management Division representative, Ms. Donna Gomien, does not have the authority to make such a decision. Furthermore, at the conclusion of the meeting Ms. Gomien indicated that the problems relating to the extension request were more substantive than the technical issues which were the main thrust of the meeting.

It is in view of these problems that we are disapproving the extension of Grant # G007402513. A brief chronology will serve to clarify how GPMD arrived at this decision:

April 30, 1979: Morris Brown College sends in a request to extend Grant # G007402513, which is due to expire June 30, 1979. No specific information is included regarding either the approved activities which have not been accomplished or the exact dollar amounts involved.

May 15, 1979: Jo Ann Balton, Program Officer, reviews and disapproves the request on the grounds that AIDP grants cannot be extended beyond their five-year term. Request is forwarded to GPMD.

June 4, 1979: Donna Gomien, Grant Specialist, contacts Bernard Smith, AIDP Coordinator at Morris Brown College, to inform him that his extension request is disapproved. Dr. Smith indicates that the topic of his extension request is still open to debate and suggests that she confirm this with the Program Office. Ms. Gomien tells him that in any event he must send a detailed budget to GPMD as soon as possible, as time is running short on the grant and final approval rests with the Grants Officer. Dr. Smith says he will call Ms. Gomien on June 6 or 7, after conferring with other college administrators. GPMD contacts Jo Ann Balton, who confirms that she had told Dr. Smith several times that five years is the absolute limit and that his grant would not be extended beyond that time.

June 6 and 7, 1979: No contact from Dr. Smith.

June 30, 1979: Grant G007402513 expires.

July 9, 1979: Donna Gomien receives a communication from Jo Ann Balton. Attached is a letter from Dr. Smith dated June 26, 1979 and addressed to Ms. Balton. It is a request to transfer monies between categories in the FY 74 grant. Ms. Balton has recommended disapproval, as the grant has expired several days earlier. Ms. Gomien concurs and contacts the grantee on the disapproval. There is no reaction from the grantee. (N.B. the budget balance indicated in this letter totals $11,200.)

July 25, 1979: Ms. Gomien receives a letter from Dr. Smith dated 17 July, 1979 requesting an extension of the grant. She contacts him immediately and explains that not only has the grant expired almost a month ago, but once again there is insufficient budget information included in the letter even if the extension were open to debate at the time.

July 27, 1979: A meeting is held on the extension request. During the course of the meeting it comes out that approximately $37,000 more is being included in the request (vs. the $11,200 of the budget transfer request of July 9, 1979). It is not clear what activities are being considered for the extension period. At the close of the meeting, Bureau Staff indicate that an extension of the grant will be considered. GPMD questions the likelihood of an extension being granted, but requests that very detailed budget information be sent.

August 3, 1979: A letter dated July 30. 1979 is delivered to Ms. Gomien. The dollar amount involved in this extension request has been raised from the $11,200 of the July 9 letter to $60,946. Two additional components are mentioned for the first time in the July 30 letter. Budget information is included for only $5,310 of the $60,946.

As can be seen from the above account, there were never any substantive technical difficulties involved in the rejection of Morris Brown College's extension request. The grantee did not respond in an adequate way to requests from the Office of Education staff. Without the information necessary to consider an extension request, OE cannot make a responsible decision to extend a grant. The grantee did not supply the information, question what types were needed, or give any indication that they intended to respond to OE Grants staff.

Therefore, based on the non-compliance of the grantee institution with OE requests, the radical changes in the budget requests from one month to the next, and the fact that the grant in question expired on June 30, 1979, Morris Brown College's request for an extension of Grant G007402513 is disapproved.

Sincerely yours,

Arthur Stewart
Grants Officer
Strengthening Developing Institutions Program

Prepared by: D. S. Gomien/dsg

cc: Dr. Alfred Moye
Dr. Leonard Spearman
Dr. Edward J. Brantley
Dr. Paul Carnell
Dr. Robert Threatt
Dr. Harold Treadwell

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION

TO : Frederick A. Will
Director
Grant and Procurement Management Division

DATE: AUG 30 1979

FROM : Executive Deputy Commissioner
for Resources and Operations

SUBJECT: Time Extension for Morris Brown College, Atlanta, GA
G007402513 - Title III SDIP

You are hereby directed to extend the Morris Brown grant through September 30, 1979, at no additional cost to the Government.

James Pickman

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION

TO : William D. Yancey, Acting Chief
HEW Federal Assistance Financing Branch
Through: William Wood, Director
Finance Division, OM/OE

DATE: SEP 14 1979

FROM : Deputy Commissioner for
Higher and Continuing Education

SUBJECT: Request to Withhold Further Release of Funds - Durham College
Durham, North Carolina
ENT #1560518117A1

This memorandum requests that the authority of the above named institution to draw further funds be withheld, effective immediately, based upon the adverse eligibility action regarding this institution until such time as you are notified by the appropriate program officers regarding changes in the funding allocations to this institution. Accredited status has been withdrawn except for the medical laboratory technician program.

Alfred L. Moye
Alfred L. Moye

cc: Director, Division of Eligibility and
Agency Evaluation, BHCE
Director, Division of Program Operations, BSFA
Chief, Campus and State Grant Branch, DPO, BSFA
Chief, Basic Grant Branch, DPO, BSFA
Director, Division of Compliance, BSFA
Chief, Audit Review Branch, DCPR, BSFA
Chief, Program Review Section, PRB, DCPR, BSFA
Regional Administrator, SFA - Region IV
Deputy Commissioner for Management
Director, Finance Division, OM
Chief, Audit Liaison and Coordination Staff, OEDC-SS, OC
Higher Education Branch, ED, OGC
Assistant Director, Division of University and
Nonprofit Audits, HEWAA, OIG

Prepared by Fred H. Sellers, Ext. 52943

Stewart

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#) 454AH 40103	2. TYPE OF REQUEST (check one) ☒ ☐ C ☐ S ☐ K ☐ M	3. GRANT NUMBER (if C, S, M request)
4. NAME OF APPLICANT Durham College		5. ENTITY NUMBER (EN) 1-56-051-8117-A1

6A. BUDGET PERIOD →	BEGIN DATE	END DATE	6B. PERFORMANCE PERIOD →	BEGIN DATE	END DATE	6C. PROJECT LENGTH (months) 12

7. REPORTS	DUE DATES			
A. QUARTERLY				8. OE PROJECT OFFICER NAME CARLOS STEWART Sinclair Jeter
B. SEMIANNUAL	✓		▨	
C. ANNUAL		▨	▨	9. GRANTEE'S PROJECT DIRECTOR NAME Samuel Evans 419) 683-2561 Ext. 254
D. FINAL E Evaluation	✓ ✓	▨	▨	

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	200 3084	4151	250,000
			10A. TOTAL →	250,000

PART II - BUDGET ANALYSIS Bilateral

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT		PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
	REQUESTED 1yr. B	RECOMMENDED C			
1. PERSONNEL	314,386				
2. FRINGE BENEFITS	24,031				
3. TRAVEL	29,818				
4. EQUIPMENT	34,038				
5. SUPPLIES	14,645				
6. CONTRACTUAL	29,192				
7. [illegible]					
8. OTHER	53,085				
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	499,195	250,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

GPMD – ORIGINAL

HB

STAFF TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

FY 1979
13.454

Name of Applicant Institution Durham College	Project Number 454AH90 103
Address 3128 Fayetteville Street Durham, NC 27707	Level ☒ 2-Year ☐ 4-Year
Title III Coordinator: Samuel Evans	Control ☐ Public ☒ Private
President: Dr. James Hill	Congressional District 4 / Region 4
Area Code 919 / Telephone 683-2561 / Extension	Requested funds for how many years? 443,145 for 1 yr.

Prior Title III Funding: $ 268,000 (1978) $ 275,000 (1977) $ 150,000 (1976)

G007804570 6-30

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report X Yes ___ No
Final Fiscal and Progress Report X in 76 Yes X in 77 No

I. Has the applicant been designated as a developing institution? ☐ No ☒ Yes

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	55	53	49	XXXX	102		✓	118,961	1
Reader	13	72	58	XXXX	130		✓	236,039	1
Reader	2	67	62	XXXX	129		✓	280,000	1
Avg.		64	56		120			211,667	ONE
Staff	15	60	52		112		✓	320,000	1
Ap. Hr.		63	57	21	141		✓	320,000	1

WIT's Requested 0 Number Approved ______ PE's Requested 0 Number Approved ______

This applicant ranked ______ by score of ______ __-year applicants.

This applicant ranked ______ by approval rank order of ______ __-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff: Carlos Stewart
Date: 4/24/79

DURHAM COLLEGE

1979 - 1980

First Revision

No specific mention OF MEDICAL LABORATORY TECHNICIAN program — compare with Second Revision

II. PART III - INSTITUTIONAL MISSION

D. CURRENT INSTITUTIONAL MISSION AND GOALS

Durham College strives to meet its purpose by means of the following specific objectives:

* 1) Recruiting and maintaining a faculty dedicated to academic excellence and a desire/ability to work with disadvantaged youth.

* 2) Providing the strong academic support necessary for academic excellence and performance through library services, media, audio-visual and other support services.

* 3) Provide strong institutional support to the academic program through the establishment of efficient, dedicated administrative and executive officers.

* 4) Fostering student development through career, personal and social counseling, cultural activities, organizations and clubs, social and recreational activities.

5) Providing service to the local community by making available college facilities for meetings, voting, and cultural activities and providing voluntary assistance to local hospitals and clinics.

6) Providing continuing educational opportunities through the Evening College for personal development and/or Health Services career advancement.

DURHAM COLLEGE

1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT

orient properly the faculty and develop their abilities to serve the needs of Durham College students.

2) Provide an increased number of on-campus, in-service workshops to develop further the abilities of administrators and their staff.
3) Provide an increased number of off-campus opportunities (conventions, workshops, or seminars) for faculty to become aware of current developments and instructional innovations within their fields of specialization.
4) Provide an increased number of off-campus opportunities for administrators and staff personnel to become aware of current developments within their field or skill areas.
5) Enable an increased number of faculty to become members of professional organizations.
6) Provide the salaries necessary to attract and retain more faculty with earned doctorates.
7) Provide the salaries necessary to attract and retain faculty with more on-the-job experience and also with more experience teaching in their fields of specialization.
8) Provide more tuition assistance for faculty so that a greater number of faculty can pursue credits beyond the masters degree during the regular academic year and also during the summer period.
9) Enable faculty to conduct and publish research relevant to instructional techniques at Durham College.
10) Provide for the purchase of more faculty professional literature (research monographs, journals, and handbooks).

Durham College will implement the following procedures to achieve the

DURHAM COLLEGE

1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT PROGRAM

above objectives.

The Academic Council's subcommittee (composed of the AcademicDean, Assistant Academic Dean, and three faculty members) together with the President will plan and execute on-campus workshops for the faculty during the academic year; outside professionals may be asked to participate.

The Administrative Council (composed of the President, Academic Dean, Director of Institutional Advancement, Dean of Student Affairs, and the Director of Admissions and Financial Aid) will plan and execute on-campus workshops for administrators and their staff personnel.

The Academic Dean and the Assistant Academic Dean will motivate and assist faculty members in selecting appropriate professional organizations in which they wish to participate. Final approval of selections will be made by the president and the Business Office will submit membership dues to the approved organizations.

The Academic Dean will interview prospective faculty throughout the academic year and during the summer. He will actively seek out those with greater experience and with the attitudes and orientation appropriate for the special task of developing the skills and potential of disadvantaged black youth. He will be cognizant of the College's need for more instructors with credits beygnd the masters level and for those with earned doctorates. The Assistant Academic Dean will assist the Dean in the evaluation of prospective faculty members. At the conclusion of the interview and evaluation process, the Academic Dean will recommend to the President those pro-

DURHAM COLLEGE

1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT PROGRAM

finding and conclusions are utilized by faculty members to upgrade their methods of instructing Durham College students. The Dean will further assist in seeking publication of the research.

The Academic Dean will recommend to the subcommittee the purchase of faculty professional Health care literature which he deems desirable for faculty development. The subcommittee will make recommendations for purchases and the President will give approval. The Dean will house the literature in his office and see to it that faculty make use of it by checking it out on a regular and frequent basis.

The Academic Dean will supervise and monitor progress toward achievement of the staff development objectives. He will assess progress toward the accomplishment of each objective by referring to a step-by-step time schedule of events which, if adhered to, will assure accomplishment of each objective according to its corresponding PEM. The Academic Dean will report monthly to the Academic Council's subcommittee and the Administrative Council on the degree of process achieved at that time one each of the ten objectives. The subcommittee and the Administrative Council will make recommendations "that will" concerning the rate of progress and any changes therein. The President's decision will be final and the Dean will execute accordingly.

DURHAM COLLEGE

1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

Institutional Advancement efforts are directed toward fund raising, alumni administration, government relations, institutional relations, and community relations.

Support is requested for the activities of IA to enable Durham College to achieve greater financial and human support from its constituences, so that it may provide its students with the environment conducive to intellectual and social growth.

Fund raising is an essential activity for the private college. Each year the pressure is greater on Durham College to locate and obtain funds from foundations, corporations and the general public. The forces of rising costs for services and supplies coupled with inflation causes concern for the survival of all private institutions. Therefore, the College must devote a portion of its resources to the quest for additional resources.

One of the most cherished of resources for institutions of higher learning is the alumni. Alumni, however, do not automatically become supporters of their alma mater upon graduation. They must be cultivated with regular communications and involvement that challenges them to give their resources of time, effort, influence and money. The College therefore must provide personnel and funds for the cultivation of alumni, and maintaining an ongoing program of involvement.

Maintaining relations with Federal, state and local Health care agencies which benefit the College with grants and other support, is essential to the life of Durham College. Proposal opportunities must be researched and

DURHAM COLLEGE

1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

proposals written and submitted to these sources. The college therefore must provide personnel and funds for maintaining these relations.

Relations within the college among its various parts is facilitated through effective communications. Without easy and frequent communications, parts tend to become isolated and even alienated from each other. To insure that relations among departments and various levels of personnel are maintained and enhanced, it is essential that the college devote resources toward improving institutional relations. To maintain positive relations with the general public, it is necessary to publicize internal events that are noteworthy. The more positive the news which is generated by an institution, the more likely it is that public support will ensue. The college therefore believes that resources should be devoted to maintaining internal and external relations that will produce positive effects.

Specific objectives to accomplish institutional goals mentioned above:

1) The College will increase the amount of funds reaised annually from external sources from $85,000 to $150,000.
2) The College will increase participation among alumni by five (5) per cent, realizing an additional 90 persons participating.
3) The College will increase the number of grant proposals prepared submitted to Federal agencies from three to six.
4) The College will prepare and submit two grant proposals to state agencies requesting funding.
5) The College will increase the number of proposals prepared and submitted to private foundations from 50 to 100.
6) The College will improve the quality of communications among its various parts through the establishment of regular and frequent publication.

DURHAM COLLEGE
1979-1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

7) The College will increase the quality of its community relations by increasing the number of news releases to the media from 56 to 100.

8) The College will increase the skill and effectiveness of IA staff through professional workshops and conferences. Staff will increase the number of annual professional growth opportunities taken from four to nine.

9) The College will revise the Long Range Planning document by December 31, 1979 to reflect current projections.

Publications and community affairs will be the responsibility of the director of IA. Advertising and publications will be prepared in conjunction with the department chairpersons requesting these services. Such items as academic catalog, yearbooks, brochures, and on-campus newsletters will be prepared through this office. External relations involving Media and participation of college representatives in community affairs will be coordinated through the IA office. Two news releases per week will be submitted to the media.

DURHAM COLLEGE

1979 - 1980

Second Revision

MANY REFERENCES TO MEDICAL LABORATORY TECH. PROGRAM INSERTED

COMPARE WITH FIRST REVISION

II. PART III - INSTITUTIONAL MISSION

D. CURRENT INSTITUTIONAL MISSION AND GOALS

Durham College strives to meet its purpose by means of the following specific objectives.

* 1) Recruiting and maintaining a qualified Health education faculty dedicated to academic excellence and a desire and ability to work with disadvantaged youth.

* 2) Providing the strong academic support necessary for academic excellence and performance, in the Allied Health Services with particular emphasis on medical laboratory technicians, through library services, media, audio-visual and other academic support services.

* 3) Provide strong institutional support to the medical laboratory technician academic program through the establishment of efficient, dedicated administrative and executive officers.

* 4) Fostering the development of MLT students through career, personal and social counseling, cultural activities, organizations and clubs, social and recreational activities.

5) Providing service to the local community by making available college facilities for meetings, voting, and cultural activities and providing voluntary assistance to local hospotals and health clinics.

6) Providing continuing education opportunities in MLT through the Evening College for professional development and/or Health Services career advancement.

The College program in medical lab technician is accredited by the Accrediting Bureau for health education schools. In its accreditation, the totality of the College's operation is reviewed and evaluated. The areas of instructions and faculty qualification, library services, student services, admission procedures and policies, business office and financial policies are all evaluated in the light of the support they provide in the successful operation of a quality Medical Laboratory technician program. Thus the accreditation of the MLT program as an area of concentration also provides direct accreditation of those normal and regular institutional functions that must be present and operative to support the specialized

DURHAM COLLEGE

1979 - 1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT

orient properly the medical laboratory-health sciences faculty and develop their abilities to serve the needs of Durham College students.

2) Provide an increased number of on-campus, in-service workshops to develop further the abilities of medical laboratory-health sciences administrators and their staffs.

3) Provide an increased number of off-campus opportunities (conventions, workshops, or seminars) for medical laboratory-health sciences faculty to become aware of current developments and instructional innovations within their fields of specialization.

4) Provide an increased number of off-campus opportunities for medical laboratory-health sciences administracors and staff personnel to become aware of current developments within their fields or skill areas.

5) Enable an increased number of medical laboratory-health sciences faculty to become members of professional organizations.

Salary scale? 6) Provide the salaries necessary to attract and retain more medical laboratory-health sciences faculty with earned doctorates.

7) Provide the salaries necessary to attract and retain medical laboratory-health sciences faculty with more on-the-job experience and also with more experience teaching in their fields of specialization.

? 8) Provide more tuition assistance so that a greater number of medical laboratory-health sciences faculty can pursue credits beyond the bachelors degree during the regular academic year and also during the summer.

9) Enable medical laboratory-health sciences faculty to conduct and publish research relevant to instructional techniques at Durham Colllege.

10) Provide for the purchase of more faculty professional literature (scientific research mongraphs, journals, and handbooks).

Durham College will implement the following procedures to achieve the

above objectives.

The Academic Council's subcommittee (composed of the Academic Dean, Assistant Academic Dean, and three faculty members) together with the President will plan and execute on-campus workshops for the medical laboratory-health sciences faculty during the academic year; outside professionals may be asked to participate.

The Administrative Council (composed of the President, Academic Dean, Director of Institutional Advancement, Dean of Student Affairs, and the Director of Admissions and Financial Aid) will plan and execute on-campus workshops for medical laboratory-health sciences administrators and their staff personnel.

The Academic Dean and the Assistant Academic Dean will encourage and assist medical laboratory-health sciences faculty members in selecting appropriate professional organizations in which they wish to participate. Final approval of selections will be made by the President and the Business Office will submit membership dues to the approved organizations.

The Academic Dean will interview prospective medical laboratory-health sciences faculty through out the academic year and during the summer. He will actively seek out those with greater experience and with the attitudes and orientation appropriate for the special task of developing the skills and potential of disadvantaged black youth. He will be cognizant of the College's need for more instructors with credits beyond the masters level and for those with earned doctorates. The Assistant Academic Dean will assist the Dean in the evaluation of prospective faculty members. At the conclusion of the

DURHAM COLLEGE

1979 - 1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 2 - STAFF DEVELOPMENT PROGRAM

to it that the research finds and conclusions are utilized by faculty members to upgrade their methods of instructing Durham College medical laboratory-health seciences students. The Dean will further assist in seeking publication of the research.

The Academic Dean will recommend to the subcommittee the purchase of faculty professional literature which he deems desirable for faculty development. The submcommitte will make recommendations for purchases and the President will give final approval. The Dean will house the literature in his office and see to it that faculty make use of it by checking it out on a regular and frequent basis.

The Academic Dean will supervise and monitor progress toward achievement of the medical laboratory-health sciences staff development objectives. He will assess progress toward the accomplishment of each objective by referring to a step-by-step time schedule of events which is adhered to will assure accomplihsment of each objective according to its corresponding PEM. The Academic Dean will report monthly to the Academic Council's subcommittee and the Administrative Council on the degree of progress achieved at that time on each of the ten objectives. The subcommittee and the Administrative Council will make recommendations at will concerning the rate of progress and any changes therein. The President's recommendations will be decisive and the Dean will execute accordingly.

DURHAM COLLEGE

1979 - 1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

Institutional Advancement efforts are directed toward fund raising, alumni adminstration, government relations, institutional relations, and community relations in order to maintain its medical laboratory-health sciences programs.

Support is requested for the activities of IA to enable Durham College to achieve greater financial and human support from its constituences, so that it may provide its students with the environment and equipment conducive to intellectual and social growth.

Fund raising is an essential activity for the private college. Each year the pressure is greater on Durham College to locate and obtain funds from foundations, corporations and the genreal public. The forces of rising costs for services and supplies coupled with inflation causes concern for the survival of all private institutions. Therefore, the college must devote a portion of its resources to the quest for additional resources.

One of the most cherished of resources for institutions of higher learning is the alumni. Alumni, however, do not automatically become supporters of their alma mater upon graduation. They must be cultivated with regular communications and involvement that challenges them to give their resources of time, effort, influence and money. The college therefore must provide personnel and funds for the cultivation of its alumni, and maintaining an ongoing program of involvement.

Maintaining relations with Federal, state, and local agencies which benefit the college with grants and other support, is essential to the life of Durham College. Medical laboratory-health sciences proposal opportunities must be researched and proposals written and submitted to these sources. The

DURHAM COLLEGE

1979 - 1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

college therefore must provide personnel and funds for maintaining these relations.

Relations within the college among its various parts its facilitated through effective communications. Without easy and frequent communications, parts tend to become isolated and even alienated from each other. To insure that relations with the medical laboratory-health sciences department and various levels of personnel are maintained and enhanced, it is essential that the college devote resources for improving institutional relations. To maintain positive relations with the general public, it is necessary to publicize internal events that are noteworthy. The more positive news which is generated by an institution, the more likely it is that public support will ensue. The college therefore believes that resources should be devoted to maintaining internal and extenal relations that will produce positive effects.

Specific objectives to accomplish institutional goals mentioned above:

1) The College will increase the amount of funds raised annually for medical laboratory-health sciences programs from external sources from $85,000 to $150,000.
2) The College will increase participation among alumni by five (5) per cent, realizing an additional 90 persons participating.
3) The College will increase the number of grant medical laboratory-health sciences proposals prepared and submitted to Federal agencies from three to six.
4) The College will prepare and submit two grant proposals to state agencies requesting funding.
5) The College will increase the number of science proposals prepared and submitted to private foundations from 50 to 100.
6) The College will improve the quality of communications among its various parts through the establishment of regular and frequent publications.

DURHAM COLLEGE

1979 - 1980

III. PART IV - PROGRAM NARRATIVE

B. ACTIVITY NARRATIVE

ACTIVITY 3 - INSTITUTIONAL ADVANCEMENT

7) The College will increase the quality of its community relations by increasing the number of news releases to the media from 56 to 100.
8) The College will increase the skill and effectiveness of IA staff through professional workshops and conferences. Staff will increase the number of annual professional growth opportunities taken from four to nine.
9) The College will revise the Long Range Planning document by December 31, 1979, to reflect current projections.

Medical laboratory-health sciences publications and community affairs will be the responsibility of the director of IA. Advertising and publications will be prepared in conjunction with the department chairpersons requesting these services. Such items as academic catalog, yearbooks, brochures, and on-campus newsletters which promote the medical laboratory-health sciences programs will be prepared through this office. External relations involving media and participation of college representatives in community affairs will be coordinated through the IA office. Two news release per week will be submitted to the media.

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION

TO Leslie W. Ross, Chief, IEB
Joseph M. Hardman, Chief, CES
Voncille McDonald, Acting Chief, OSES
Ronald Pugsley, Chief, AAEB

DATE September 28, 1979

FROM Director
Division of Eligibility and Agency Evaluation

SUBJECT POLICY: - Eligibility Status of Complex Institutions Which Have Only Specialized Accreditation for Certain Programs

1. We have received increasing numbers of eligibility applications for designation as "institutions of higher education" or "vocational schools" from educational entities which are complex or multipurpose institutions that lack accreditation for all the programs they offer. Frequently these entities, although lacking institutional accreditation, do offer one or two or a few programs which have attained specialized or programmatic accreditation.

2. a. In all cases where a complex or multipurpose educational entity seeks eligibility, but is not accredited, yet has some accredited programs, the scope of the eligibility status conferred shall not include programs of institutional support, but will be limited to programs of student assistance. In these instances, the complex multipurpose institution must have comprehensive institutional accreditation before it can be cited as eligible to apply for programs of institutional aid or support.

b. For example, a multipurpose complex institution lacking comprehensive institutional accreditation will not be cited eligible to apply for institutional support such as:

Title I - Community Service and Continuing Education Programs
Title II - College Library Programs: A. Resources, B. Training
→ Title III - Strengthening Developing Institutions
Title VI A - Improvement of Undergraduate Instruction - Equipment
Title VII - Academic Facilities - A, B, and C
Title VIII - Cooperative Education Program
Title IX - Graduate Programs and Fellowships - A, B, C, and D
Title XI - Law School Clinical Experience Program

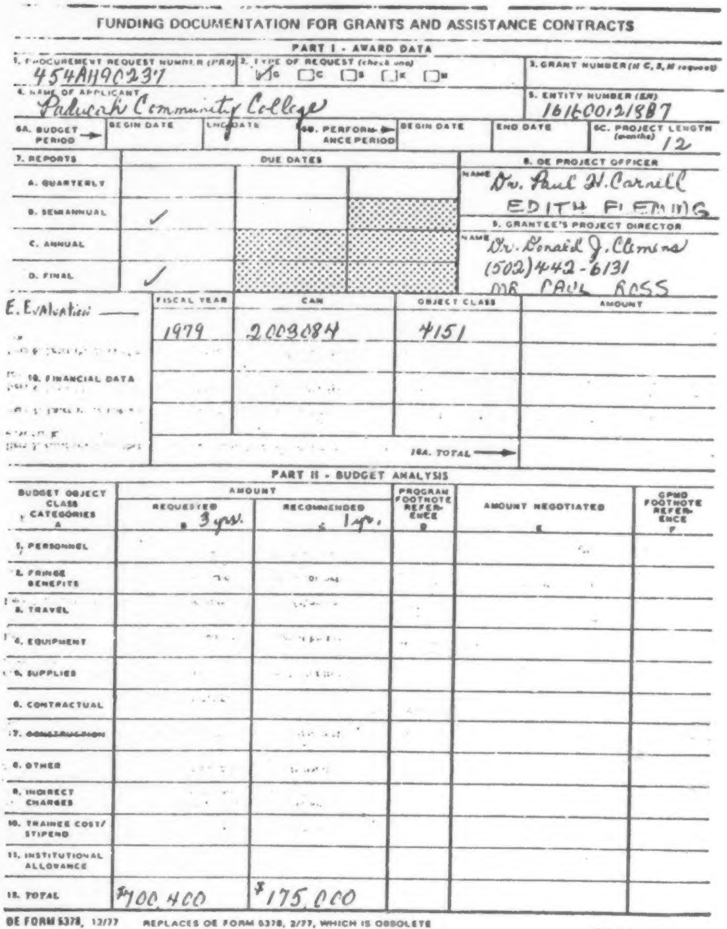
However, such institutions would be cited as eligible to apply for programs of student financial assistance, such as those provided by Title IV of the Higher Education Act.

3. This ruling does not apply to free-standing, predominantly single purpose institutions, such as law schools, art schools, or other institutions which hold specialized institutional-programmatic accreditation for the educational offering of the institution.

All questions concerning this policy should be referred to me.

John R. Proffitt

John R. Proffitt



FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#) 454AH90237	2. TYPE OF REQUEST (check one) ☑ G ☐ C ☐ S ☐ K ☐ N	3. GRANT NUMBER (If C, S, N request)
4. NAME OF APPLICANT Paducah Community College		5. ENTITY NUMBER (EN) 1616001218B7

6A. BUDGET PERIOD →	BEGIN DATE	END DATE	6B. PERFORMANCE PERIOD →	BEGIN DATE	END DATE	6C. PROJECT LENGTH (months) 12

7. REPORTS	DUE DATES		
A. QUARTERLY			
B. SEMIANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL	✓	▨	▨

8. OE PROJECT OFFICER
NAME Dr. Paul H. Carnell
EDITH FLEMING

9. GRANTEE'S PROJECT DIRECTOR
NAME Dr. Donald J. Clemens
(502) 442-6131
MR PAUL ROSS

E. Evaluation

	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
10. FINANCIAL DATA	1979	2003084	4151	
			10A. TOTAL →	

PART II - BUDGET ANALYSIS

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B 3 yrs.	AMOUNT RECOMMENDED C 1 yr.	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL					
2. FRINGE BENEFITS					
3. TRAVEL					
4. EQUIPMENT					
5. SUPPLIES					
6. CONTRACTUAL					
7. ~~CONSTRUCTION~~					
8. OTHER					
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	$400,400	$175,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

GPMD – ORIGINAL

STAFF TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

FY 1979
13.454

Name of Applicant Institution Paducah Community College	Project Number 454AH90 ~~XXX~~ 237
Address Paducah, Kentucky 42001	Level ☒ 2-Year ☐ 4-Year
Title III Coordinator: Dr. Donald J. Clemens	Control ☒ Public ☐ Private
President: Dr. Donald J. Clemens	Congressional District FIRST · Region 4
Area Code 502 · Telephone 442-613 · Extension	Requested funds for how many years? ~~[illegible]~~ 5 years – 700,4

Prior Title III Funding: $ —— 1978 $ —— 1977 $ —— 1976

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report ___ Yes ___ No Final Fiscal and Progress Report ___ Yes ___ No NA

1. Has the applicant been designated as a developing institution? ☒ No ☐ Yes 032

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	41	52	49	XXXX	101		✓	$185,600	3
Reader	10	67	22	XXXX	89	✓			
Reader	53	72	49	XXXX	121		✓	144,100	2
AVE	—	64	40	—	104			109,900	2
Staff	8	82	40		122		✓	175,000	1
Comp.		69	41	12	122		✓	175,000	1

NTP's Requested 0 Number Approved ____ PE's Requested 0 Number Approved ____

This applicant ranked _____ by score of _____ ___-year applicants.

This applicant ranked _____ by approval rank order of _____ ___-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff Edith P. Fleming	Date August 10, 1979

GPO 937-770

Edward Brantley
Director, Division of Institutional Development

18 September 1979

Lawrence LaMoure
Chief, Program Development Branch

Eligibility of Five Kentucky Community Colleges

Upon reviewing the applications submitted by the five community colleges in Kentucky, the division found these branch campuses ineligible to participate in the 1979 Grant process for the Title III, HEW program in March of 1979 and again in June of 1979. Primarily because they did not meet the criteria contained in the published regulations which state; "Branch campuses must have: 1. accreditation status; 2. budget controll;and; 3. hiring authority;as a branch campus."

On August 8, the INstitutional Eligibility Branch/DEAE found the five campuses of: Henderson Community College, Jackson Community College, Paducah Community College, Prestonburg Community College and South Eastern Community College eligible institutions as branch campuses and as a result received funds from the 1979 award process.

There is suspicision on the part of the staff that in spite of the documentation that has been forwarded to this agency that indicates that these docations are branch campuses and meet the published criteria, they in fact do not. Saaff further believes that upon site visits, it will be determined that these institutions are not eligible for funds. If this assumptions proves to be correct, the program could find itself in an embarassing situation attempting to collect funds from the State insitutions or declaring them ineligible innthe 1980 grant application process which would embarass this Bureau regarding the 1979 decision.

NOTE: It is my opinion that all institutions once they have been found eligible, will have to be found eligible for all the grant award cycles conducted under the current regulation. No documentation was furnished by the Kentucky Schools; all data was provided by phone.

APPLICATION TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Catalog of Federal Domestic Assistance Number 13.454

APPLICANT

NAME OF APPLICANT INSTITUTION: CANISIUS COLLEGE

PROJECT NUMBER: 454 AH90 026

ADDRESS: 2001 MAIN STREET

Level __ 2-year ✓ 4-year

Control __ Public ✓ Private

CITY, STATE, AND ZIP CODE: BUFFALO, NEW YORK

AMOUNT REQUESTED BY APPLICANT: $ 1,956,451

Duration of Project: Requested funds for how many years? ☐1 ☐2 ☑3 ☐4 ☐5

1. Do you recommend Federal support? ☐ Yes HB ☐ $ CkF NO ☑
2. If yes is checked, amount recommended. $________
3. If yes is checked, recommend award for how many years: ☐1 ☐2 ☐3 ☐4 ☐5
4. Total score of the evaluation criteria ~~[illegible]~~ 105 75

Summary Comments:

This institution should be funded only after all other institutions, much more in need and serving many more needed students, have been adequated funded.

Technical Reviewer

NAME OF READER (Print): CHARLES E FLOWERS

ASSIGNED READER NUMBER: 9

TITLE OF READER: EXEC. ASS't TO PRESIDENT

PHONE NUMBER: 804-623-8676

BUSINESS ADDRESS OF READER (COLLEGE): NORFOLK STATE

CITY, STATE, AND ZIP CODE: NORFOLK, VA 23504

I have reviewed the application in accordance with the "scope of work" that has been signed and returned to the Office of Education.

SIGNATURE: Charles E Flowers

DATE: 2/28/79

OE FORM 1335, 6/78 (FM Control No. 38)

APPLICATION TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

WORK COPY

Catalog of Federal Domestic Assistance Number 13.454

APPLICANT

NAME OF APPLICANT INSTITUTION Canisius College	PROJECT NUMBER 454 AH90 026
ADDRESS 2001 Main Street	Level __ 2-year X 4-yea Control__ Public X Priva
CITY, STATE, AND ZIP CODE Buffalo, New York 14208	AMOUNT REQUESTED BY APPLICANT $ 1,956,451

Duration of Project: Requested funds for how many years? ☐ 1 ☐ 2 ☒ 3 ☐ 4 ☐ 5

1. Do you recommend Federal support? ☐ YES ☒ NO
2. If yes is checked, amount recommended. $__________
3. If yes is checked, recommend award for how many years: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5
4. Total score of the evaluation criteria 71 + 53 = 124

Summary Comments:

The application presents a clearly defined program to strengthen the institution, or, rather, to expand its programs. However, the data presented also indicates that the institution has proposed beyond the crucial need for funds for survival. P. 31: P. 49. P. 78. P. 148.

Technical Reviewer

NAME OF READER (Print) Bernice R. Retzlaff	ASSIGNED READER NUMBER 9-1-5
TITLE OF READER Education Program Specialist	PHONE NUMBER 245-7091
BUSINESS ADDRESS OF READER (COLLEGE) O.E.	CITY, STATE, AND ZIP CODE Wash., DC. 20202

I have reviewed the application in accordance with the "review of work" that has been signed and returned to the Office of Education.

SIGNATURE Bernice R. Retzlaff	DATE 4/6/79

OE FORM 1335, 4/78 (FM Control No. 23)

Retzlaff

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PRN) 454AH90026	2. TYPE OF REQUEST (check one) ☒ N ☐ C ☐ S ☐ R ☐ M	3. GRANT NUMBER (if C, S, R request)
4. NAME OF APPLICANT Canisius College, NY		5. ENTITY NUMBER (EN) 116074 3942A1

6A. BUDGET PERIOD →	BEGIN DATE	END DATE	6B. PERFORMANCE PERIOD →	BEGIN DATE	END DATE	6C. PROJECT LENGTH (months) 12 Months

7. REPORTS		DUE DATES		
A. QUARTERLY				
B. SEMIANNUAL	✓		▨	
C. ANNUAL		▨	▨	
D. FINAL E Evaluation	✓ ✓	▨	▨	

8. OE PROJECT OFFICER
NAME Paul Cornell

9. GRANTEE'S PROJECT DIRECTOR
NAME Mr. Griffith Jones
(716) 883-7000 x ~~3~~ 566

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	2003084	4151	
			10A. TOTAL →	

Bilateral PART II - BUDGET ANALYSIS Bilateral

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED 3 years B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL	1,171,145				
2. FRINGE BENEFITS	166,305				
3. TRAVEL	86,850				
4. EQUIPMENT	170,712				
5. SUPPLIES	93,050				
6. CONTRACTUAL	177,200				
5 NITS ~~7. CONSTRUCTION~~	(37,500)				
8. OTHER	91,039				
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	1,956,301	380,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

GPMD – ORIGINAL

STAFF TECHNICAL REVIEW

FY 1979
13.454

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Name of Applicant Institution: Canisius College

Project Number: 434AH90 026

Address: 2001 Main Street
Buffalo New York 14208

Level: ☐ 2-Year ☒ 4-Year

Title III Coordinator: Mr. Griffith Jones

Control: ☐ Public ☒ Private

President: Rev. James M. Demske, S.J.

Congressional District: 37

Region: 2

Area Code: 716

Telephone: 883-7000

Extension: 314

Requested funds for how many years? $1,956,451 3 years

Prior Title III Funding: $ AIDP funded in 1975 for $1,525,000

1978	1977	1976

If funded in FY 1977 or 1976, were satisfactory reports submitted?

Evaluation Report X Yes ___ No

Final Fiscal and Progress Report X Yes ___ No

I. Has the applicant been designated as a developing institution? ☐ No ☒ Yes

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	9	75	30	XXXX	105	X			
Reader	90	82	67	XXXX	149		X	865,000	3
Reader	87	77	48	XXXX	125		X	700,000	3
Avg.		78	48.33		126			521,667	
Staff	4-5	71	53		124	X		0	
Approp. IE pts		69	53		117	X		0	

75 52 staff 128 [illegible] 5/30/79

NIT's Requested 5 Number Approved 0

PE's Requested 6 Number Approved 0

* Readers' comments pointed out the lack of planning apart from present AIDP grant programs.

This applicant ranked _____ by score of _____ __-year applicants.

This applicant ranked _____ by approval rank order of _____ __-year applicants.

*Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff: Bernice R. Rettgoff

Date: 4/27/79

(2) A decrease in total current funds revenues during any of the three years preceding the year in which the institution seeks designation as a developing institution.

(3) An excess of expenditures plus mandatory transfers over revenues in the unrestricted current funds during any two of the three years preceding the year in which the institution seeks designation as a developing institution. In this section the term "current funds" means the funds available for use in meeting current operations.

(f) The Commissioner considers an institution to be struggling and isolated for purposes of paragraph (b) of this section if the institution—

(1) Received a grant under this part in the fiscal year ending September 30, 1978; or

(2) Received a grant under the Advanced Institutional Development Program in a prior fiscal year for an award period with an original expiration date on or after June 30, 1979.

(20 U.S.C. 1052(a)(1)(D)(ii))

§ 169.19 Desire, potential, and reasonable effort.

(a) To be designated as a developing institution, an institution must possess the desire and potential to make a substantial and distinctive contribution to the higher education resources of the Nation. Such a contribution might, for example, be to provide access to a particular group of students who would not otherwise have access to an institution of higher education; or the institution may offer a particular set of academic programs that are not otherwise available to the types of students who comprise its student body.

(b) In addition, the institution must have taken concrete steps to improve its overall academic and administrative capacity over the past three years and, specifically, have made a reasonable effort to improve the quality of its administrative and instructional staffs and its student services.

(c) Except as provided in paragraph (e) of this section, the institution shall submit to the Commissioner, as part of its request for designation as a developing institution, a narrative describing—

(1) The mission and goals of the institution; and

(2) The tangible progress that the institution has made over the past three years to reach its specific goals, with special emphasis on activities carried out in the improvement of—

(i) Instructional staff;

(ii) Administrative staff; and

(iii) Student services.

(d) On the basis of the narrative, the Commissioner determines whether the institution meets the criteria of having the desire and potential of making a significant contribution to the higher educational resources of the Nation and has been making a reasonable effort to improve its instructional program, its administrative capacity, and its student services.

(e) The Commissioner considers any institution to have satisfied the requirements of this section if the institution—

(1) Received a grant under this part in the fiscal year ending September 30, 1978; or

(2) Received a grant under the Advanced Institutional Development Program in a prior fiscal year for an award period with an original expiration date on or after June 30, 1979.

(20 U.S.C. 1054)

Subpart C—Types of Awards

§ 169.21 Introduction.

The Commissioner makes three types of awards of Title III assistance:

(a) Cooperative arrangement grants.

(b) National Teaching Fellowships.

(c) Professor Emeritus Grants.

Each award is made from a single fiscal year's appropriation for Title III.

(20 U.S.C. 1054(b))

§ 169.22 Cooperative arrangements.

(a) A cooperative arrangement is one or more working relationships between a developing institution and other institutions of higher education, agencies, organizations, or business entities to assist the developing institution in implementing activities under a title III grant.

(b) There are two kinds of cooperative arrangements:

(1) *Bilateral arrangements.* Under a bilateral arrangement the developing institution draws upon the assistance and services of another higher educational institution, agency, organization, or business entity to strengthen its academic quality, or administrative, management, and financial capacity.

(2) *Consortium arrangements.* (i) Under a consortium arrangement two or more developing institutions agree to work with each other to strengthen themselves in the areas indicated or enter into an arrangement with an institution of higher education, agency, organization, or business entity to help a cluster of developing institutions carry out allowable activities.

(ii) One of the developing institutions participating in the consortium arrangement shall serve as the applicant and coordinator.

(iii) The institution coordinating the consortium arrangement is responsible for complying with the terms and conditions of the grant.

(iv) Every participating institution receiving services from a consortium arrangement shall be a developing institution and shall receive services in proportion to its share of the grant.

(v) The size of a consortium arrangement is limited to the number of institutions that can be effectively and efficiently served.

(20 U.S.C. 1054)

§ 169.23 National Teaching Fellowship grant.

(a) A National Teaching Fellowship grant is the second type of award made by the Commissioner under title III. A developing institution may request a National Teaching Fellowship either—

(1) As part of a cooperative arrangement; or

(2) Independent of any other type of award.

(b) The Commissioner awards a National Teaching Fellowship of one or two years' duration through a developing institution to—

(1) Junior faculty members from institutions other than the applicant institution; and

(2) Highly qualified graduate students—from institutions other than the applicant institution—who have at least a master's degree or related professional experience.

(c) A developing institution may have a National Teaching Fellow—

(1) Teach in an understaffed or new academic program; or

(2) Substitute for a faculty member released for further training or advanced study.

(d) A National Teaching Fellow shall serve as a full-time faculty member at the developing institution through which the award is made.

(e) Each National Teaching Fellow receives a stipend of $7,500 plus $400 per dependent for each academic year of teaching. A developing institution at which a National Teaching Fellow teaches may supplement the stipend with funds from sources other than title III.

(20 U.S.C. 1054)

§ 169.24 Professor Emeritus Grant.

(a) A Professor Emeritus Grant is the third type of award made by the Commissioner under title III. A developing institution may request a Professor Emeritus Grant either—

(1) As part of a cooperative arrangement; or

(2) Independent of any other type of award.

(b) The Commissioner awards a Professor Emeritus Grant through a developing institution to a professor who has retired from active service at an institution of higher education other than the grantee institution.

(c) A developing institution may have a Professor Emeritus—

$150,300

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE OFFICE OF EDUCATION WASHINGTON, D.C. 20202 **GRANT APPLICATION FOR STRENGTHENING DEVELOPING INSTITUTIONS PROGRAM** *(Authority: Title III, Higher Education Act, 1965, P.L. 89-329)*	ACTIVITY NUMBER 1	PAGE NO. 1	FORM APPROVED O.M.B. NO. 51-R0966
		NUMBER OF PAGES 2	PART II CONSORTIUM PARTICIPANTS

1. NAME OF APPLICANT INSTITUTION
Florida Junior College at Jacksonville

2. ACTIVITY TITLE
Planning for Fiscal Stability

3. PARTICIPATING INSTITUTIONS

a. NAME	b. LOCATION (City and State)	c. DEVELOPING STATUS	d. FUNDS REQUESTED	e. NO. NTF's REQUESTED	f. NO. PE's REQUESTED
California					
College of Alameda	Alameda, California	No	$12,525*	None	None
Florida					
x Florida Junior College at Jacksonville	Jacksonville, Florida	Yes	$12,525*	None	None
x St. Petersburg Junior College	St. Petersburg, Florida	Yes	$12,525*	None	None
Illinois					
x Lewis and Clark Community College	Godfrey, Illinois	Yes	$12,525*	None	None
Iowa					
x Southwestern Community College	Creston, Iowa	Yes	$12,525*	None	None
Massachusetts					
x Wentworth Institute of Technology	Boston, Mass.	Yes	$12,525*	None	None
Michigan					
Alpena Community College	Alpena, Michigan	No	$12,525*	None	None
Mississippi					
Mary Holmes College	West Point, Mississippi	No	$12,525*	None	None
New Jersey					
Cumberland County College	Vineland, New Jersey	No	$12,525*	None	None
New York					
Medaille College	Buffalo, New York	No	$12,525*	None	None
Mercy College	Dobbs Ferry, New York	No	$12,525*	None	None

OE FORM 1049-1, 11/74 (PM Control No. 87)

5

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DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE OFFICE OF EDUCATION WASHINGTON, D.C. 20202 **GRANT APPLICATION FOR STRENGTHENING DEVELOPING INSTITUTIONS PROGRAM** *(Authority: Title III, Higher Education Act, 1965, P.L. 89-329)*	ACTIVITY NUMBER 1	PAGE NO. 2 NUMBER OF PAGES 2	FORM APPROVED O.M.B. NO. 51-R0586 PART II CONSORTIUM PARTICIPANTS

1. NAME OF APPLICANT INSTITUTION	2. ACTIVITY TITLE
Florida Junior College at Jacksonville	Planning for Fiscal Stability

3. PARTICIPATING INSTITUTIONS

a. NAME	b. LOCATION *(City and State)*	c. DEVELOPING STATUS	d. FUNDS REQUESTED	e. NO. NTF's REQUESTED	f. NO. PI's REQUESTED
Oklahoma					
Claremore College	Claremore, Oklahoma	Yes	$12,525*	None	None
Murray State College	Tishomingo, Oklahoma	No	$12,525*	None	None
Pennsylvania					
King's College	Wilkes-Barre, Penn.	Yes	$12,525*	None	None
Lackawanna Junior College	Scranton, Penn.	Yes	$12,525*	None	None
Northeastern Christian Junior College	Villanova, Penn.	Yes	$12,525*	None	None
Williamsport Area Community College	Williamsport, Penn.	Yes	$12,525*	None	None
Tennessee					
Roane State Community College	Harriman, Tennessee	Yes	$12,525*	None	None
Washington					
Wenatchee Valley College	Wenatchee, Washington	No	$12,525*	None	None
Yakima Valley College	Yakima, Washington	Yes	$12,525*	None	None

* The total amount of the grant less the funds allocated for program administration by the coordinating institution is $250,340. Therefore, the amount of funds shown for each participating institution represents their proportional share of $250,340.

OE FORM 1049-1, 11/71 *(FM Control No. 87)*

APPENDIX A
TO THE
LETTER OF AGREEMENT BETWEEN
FLORIDA JUNIOR COLLEGE AT JACKSONVILLE
AND
McMANIS ASSOCIATES, INC.

SCOPE OF SERVICES

Under this Agreement, McMANIS and FLORIDA JUNIOR COLLEGE AT JACKSONVILLE will cooperate to achieve the outcomes of each of the tasks set forth below. McMANIS will provide the professional services described and FLORIDA JUNIOR COLLEGE will make best efforts to facilitate the work of McMANIS. The time-phased plan of action for the consortium given here in *Table I* will be used as a basic guide for carrying out the tasks. FLORIDA JUNIOR COLLEGE may, however, when a task is dependent upon completion of another task, make adjustments to this schedule when doing so will facilitate successful completion of the tasks and impose a reasonable delay in the initiation of the dependent task.

The price stated for each task is the best estimate by McMANIS, at the time of execution of this Agreement, of funds required to provide the services specified therein. McMANIS and FLORIDA JUNIOR COLLEGE may, by mutual agreement, amend the task descriptions or the level of professional services devoted thereto, to ensure the maximum benefit from funds obligated to the Agreement.

TASK 1. *Information Dissemination.* McManis will collect information about institutional planning, package the information for use by member institutions in the design of their planning systems, and distribute it to them. In addition, McManis will produce four newsletters that will describe the efforts being made in the development of planning systems at other institutions. $17,000

TASK 2. *Regional Conferences.* McManis will identify the planning topics of greatest interest to member institutions, design a series of four workshops that address these topics, coordinate and schedule the workshops, and analyze the evaluations submitted by the participants. The end result of these workshops will be to provide the member institutions with specific guidance on the design of planning systems, planning techniques, data collection methods, and the establishment of linkages with other management systems.. . . . . $21,200

TASK 3. *Technical Assistance.* McManis will inform member institutions of the nature of technical assistance available; analyze, in conjunction with FJC, the requests for technical assistance from each member institution; provide the technical assistance requested, within terms of the grant; and review the evaluations by member institutions following completion of the technical assistance. The purpose of these on-site visits would be to provide assistance in the design and implementation of institutional planning systems, as well as supportive studies such as needs assessment, community impact, and organizational patterns. $94,000

Total................. $132,200

APPENDIX B

APPENDIX B
FLORIDA JUNIOR COLLEGE AT JACKSONVILLE

COST/PRICE ANALYSIS

Labor	Hours	Avg. Rate	Total
Officers	40	$24.28	$ 971
Division Director	176	19.61	3,451
Senior Associate	1590	14.91	23,707
Associate	160	9.08	1,453
Administrative	760	5.84	4,438
			$ 34,020
Fringes (22%)			7,484
	Total Labor		$ 41,504
Overhead (120% Total Labor)			49,805
Materials and Supplies			3,000
*Travel			25,920
	Total Cost		$120,229
Fee (10% Total Cost)			12,023
	Price		$132,252
	Fixed Price Quote		$132,200

*17 colleges x 3 trips @ $200 (avg.)	=	$10,800
4 conferences x 2 trips @ $200 (avg.)	=	1,600
Living expenses: 169 days @ $45	=	7,005
Auto: 169 days @ $35		5,915
		$25,920

This cost/price analysis conforms with Federal cost principles. Rates for fringe benefits and overhead are those quoted to and accepted by the Federal Government. Our financial accounts have been audited (by HEW, EPA, AID, etc.) per routine pre-award and postcontract procedures. No exceptions have been taken.

Pitts

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PRN) 454AH 10121	2. TYPE OF REQUEST (check one) ☒ N ☐ C ☐ S ☐ K ☐ M	3. GRANT NUMBER (If C, S, M request)
4. NAME OF APPLICANT FLORIDA JUNIOR COLLEGE AT JACKSONVILLE		5. ENTITY NUMBER (EN) 1-59-114-9317-A1

6A. BUDGET PERIOD →	BEGIN DATE	END DATE	6B. PERFORMANCE PERIOD →	BEGIN DATE	END DATE	6C. PROJECT LENGTH (months) 12

7. REPORTS	DUE DATES		
A. QUARTERLY			
B. SEMIANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL	✓	▨	▨
E. EVALUATION ✓			

8. OE PROJECT OFFICER
NAME LORETTA WAWRZYNIAK

9. GRANTEE'S PROJECT DIRECTOR
NAME (904) 358-1812, Ext. 310
STEPHEN R. WISE

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	2003084	4151	$153,000
			10A. TOTAL →	

PART II - BUDGET ANALYSIS CONSORTIUM

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL	$ 30,034				
2. FRINGE BENEFITS	6,007				
3. TRAVEL	4,200				
4. EQUIPMENT	— 0 —				
5. SUPPLIES	1,100				
6. CONTRACTUAL	247,300 O NIT'S AND PE'S				
7. ~~CONSTRUCTION~~					
8. OTHER	1,859				
9. INDIRECT CHARGES	— 0 —				
10. TRAINEE COST/STIPEND	— 0 —				
11. INSTITUTIONAL ALLOWANCE	— 0 —				
12. TOTAL	$ 290,500	153,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

GPMD – ORIGINAL

STAFF TECHNICAL REVIEW

FY 1979
13.454

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Name of Applicant Institution Eastern Arizona College	Project Number 454AH90 235
Address 616 Church Street Safford, Arizona 85552	Level ☒ 2-Year ☐ 4-Year
Title III Coordinator: Wayne M. McGrath	Control ☒ Public ☐ Private
President: Wayne M. McGrath	Congressional District FOURTH — Region 9
Area Code 602 — Telephone 427-1133 — Extension 231	Requested funds for how many years? 461,000 3yrs

Prior Title III Funding: $ —— (1978) $ 240,000 (1977) $ —— (1976)

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report [✓ Yes] No   Final Fiscal and Progress Report [✓ Yes] No

1. Has the applicant been designated as a developing institution? ☐ No ☑ Yes

   a. If no, applicant could not be funded.
   b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	18	71	47	XXXX	118		X	272,056	2
Reader	20	60	43	XXXX	103		X	5,990	1
Reader	63	90	64	XXXX	154		X	128,367	1
Average		74	51		125			134,005	1
Staff	17	41	23		64	X			
Approp # PTS		54	~~33~~ 31	0	~~87~~ 85		X	25,000	1

MIF's Requested 0 Number Approved ____   PE's Requested 0 Number Approved ____

Bilateral

This applicant ranked ____ by score of ____ __-year applicants.

This applicant ranked ____ by approval rank order of ____ __-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff: Jo Ann Barton   Date: 4/24/79

GPO [illegible]

STAFF TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS — FY 1979 13.454

Name of Applicant Institution: Eastern Arizona College

Address

Project Number 434AH90 285

Level ☐ 2-Year ☐ 4-Year

Title III Coordinator:

President:

Control ☐ Public ☐ Private

Area Code	Telephone	Extension		Congressional District	Region
			[redacted]		

Requested funds for how many years?

Prior Title III Funding: $______ 1978 $______ 1977 $______ 1976

If funded in FY 1977 or 1976, were satisfactory reports submitted?

Evaluation Report __ Yes __ No   Final Fiscal and Progress Report __ Yes __ No

1. Has the applicant been designated as a developing institution? ☐ No ☐ Yes
   a. If no, applicant could not be funded.
   b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader									
Reader				XXXX					
Reader				XXXX					
				XXXX					
Staff									
App. NO Points		74	51	20	145		X	100,000	1

NTF's Requested ______ Number Approved ______

PE's Requested ______ Number Approved ______

This applicant ranked ______ by score of ______ __-year applicants.

This applicant ranked ______ by approval rank order of ______ __-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff: Peggy J. Whitehead
Sinclair V. Jeter

Date 6/21/79

GPO 937.770

Committee Review

EVALUATION CRITERIA	Reader Number
	PROJECT NUMBER 454AH90 235

ADDITIONAL COMMENTS

The Committee reviewed the ratings and comments of the 4 readers and concluded that insufficient weight was given to the three outside reviewers ratings. Therefore, we recommend 125 for 169.52 & 169.53. We further recommend 20 additional points because of the minorities served and the location of the college. The We have also reassessed the amount recommended and concluded that $100,000 is more appropriate because it takes into account the recommendations of all 4 readers.

6/28/79 Peggy J. Whitehead

Karl C. H

GPO 927-100

Belton

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PRNo) 454 AH 90235

2. TYPE OF REQUEST (check one) ☒ ☐C ☐S ☐K ☐M

3. GRANT NUMBER (If C, S, M request)

4. NAME OF APPLICANT EASTERN ARIZONA COLLEGE

5. ENTITY NUMBER (EN) 1-86-600-0754-A1

6A. BUDGET PERIOD → BEGIN DATE END DATE

6B. PERFORMANCE PERIOD → BEGIN DATE END DATE

6C. PROJECT LENGTH (months) 12

7. REPORTS

	DUE DATES		
A. QUARTERLY			
B. SEMIANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL	✓	▨	▨

E. EVALUATION ✓

8. OE PROJECT OFFICER

NAME LORNA A WAUKLIWIAK

9. GRANTEE'S PROJECT DIRECTOR

NAME 602-428-1133 X 231 WAYNE M. McGRATH

10. FINANCIAL DATA

FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
1979	2003084	4151	125,000
		10A. TOTAL →	

3 years

PART II - BUDGET ANALYSIS BILATERAL

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL	331,425.				
2. FRINGE BENEFITS	62,736.				
3. TRAVEL	45,485.				
4. EQUIPMENT	5,789.				
5. SUPPLIES	4,400.				
6. CONTRACTUAL	—				
7. ~~CONSTRUCTION~~	—				
8. OTHER	19,330.				
9. INDIRECT CHARGES	—				
10. TRAINEE COST/ STIPEND	—				
11. INSTITUTIONAL ALLOWANCE	—				
X 12. TOTAL	469,165	125,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 3/77, WHICH IS OBSOLETE

GPMD – ORIGINAL

APPLICATION TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Catalog of Federal Domestic Assistance Number 13.454

APPLICANT

NAME OF APPLICANT INSTITUTION Catholic University of Puerto Rico	PROJECT NUMBER 454 AH90 495
ADDRESS Las Americas Ave.	Level __ 2-year X 4-year Control __ Public X Private
CITY, STATE, AND ZIP CODE Ponce Puerto Rico 00731	AMOUNT REQUESTED BY APPLICANT $1.563.147

Duration of Project: Requested funds for how many years? ☒ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

1. Do you recommend Federal support? ☐ YES ☒ NO

2. If yes is checked, amount recommended. $__________

3. If yes is checked, recommend award for how many years: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5

4. Total score of the evaluation criteria 20 P 12

Summary Comments:

there is no real picture regarding how this institution is serving the students it has now. The reader does not know how many professional people work at the institution or where they work.

It does not seem reasonable that the school can add over 100 new people in one year. The result would be chaotic and do more damage than good.

Technical Reviewer

NAME OF READER (Print) MICHAEL P. SANCHEZ	ASSIGNED READER NUMBER 35
TITLE OF READER Asst. DEAN for Student Affairs	PHONE NUMBER 303-598-3737 X355
BUSINESS ADDRESS OF READER (COLLEGE) Cragmor Rd	CITY, STATE, AND ZIP CODE Colo. Spgs, Colo. 80907

I have reviewed the application in accordance with the "scope of work" that has been signed and returned to the Office of Education.

SIGNATURE Michael P. Sanchez	DATE 2-27-79

OE FORM 1335, 4/78 (FM Control No. 38)

APPLICATION TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Catalog of Federal Domestic Assistance Number 13.454

APPLICANT

NAME OF APPLICANT INSTITUTION Catholic University of Puerto Rico	PROJECT NUMBER 454 AH90 495
ADDRESS Las Americas	Level __ 2-year X 4-year Control __ Public X Private
CITY, STATE, AND ZIP CODE Ponce, Puerto Rico 00731	AMOUNT REQUESTED BY APPLICANT $2,819,477

Duration of Project: Requested funds for how many years? ☐1 ☒2 ☐3 ☐4 ☐5

1. Do you recommend Federal support? ☐ YES ☒ NO
2. If yes is checked, amount recommended. $ 0
3. If yes is checked, recommend award for how many years: ☐1 ☐2 ☐3 ☐4 ☐5
4. Total score of the evaluation criteria 74 41

Summary Comments: Amount requested on Form 1049-1 does not agree
with budget information part VI. No of years does not agree
The mission is vaguely stated, as well as the use of funds.
Curriculum Development and Improvement is not only the
prerogative of the faculty but also the responsibility. Quite
frankly, the funds for NTF I would consider supporting. The
proposal failed to identify how it would use the funds to
increase the mobility of the students. The institution should
make plans to evaluate what the accrediting association
suggested in light of it's own commitments

Technical Reviewer

NAME OF READER (Print) Mary Ann Hickman		ASSIGNED READER NUMBER 67
TITLE OF READER Assist. Vice Chancellor Personnel		PHONE NUMBER 404 - 656-2272
BUSINESS ADDRESS OF READER (COLLEGE) 244 Washington St, S.W. Rm. 459	CITY, STATE, AND ZIP CODE Atlanta, Georgia 30334	

I have reviewed the application in accordance with the "scope of work" that has been signed and returned to the Office of Education.

SIGNATURE	DATE

OE FORM 1335, 4/78 (FM Control No. 38)

STAFF TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

FY 1979
13.454

Name of Applicant Institution: Catholic University of Puerto Rico

Project Number: 434AH90 445

Address: Postal Substation 6
Ponce, PR (00731)

Level: ☐ 2-Year ☒ 4-Year

Title III Coordinator: José L. Hernández

Control: ☐ Public ☒ Private

President: Francisco J. Carreras

Congressional District: N/A

Region: 2

Area Code: 809

Telephone: 844-4150

Extension: 138

Requested funds for how many years? 1 year * 1,565,147

*(Submitting: but not requested $2,819,477 for 2 years)

Prior Title III Funding: $ 279,500 (1978) $ 300,000 (1977) $ 250,000 (1976)

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report ___ Yes X No Final Fiscal and Progress Report X Yes ___ No

1. Has the applicant been designated as a developing institution? ☐ No ☒ Yes

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	35	12	8	XXXX	20	x		–	–
Reader	67	41	33	XXXX	74	x		–	–
Reader	27	20	9	XXXX	29	x		–	–
AVG.		24.33	17		41			–	–
Staff	5	83	64		147		x	250,000	1
Appr #fk.		63	31	6	~~74~~ 100	x		–	–

1/30/79

WIT's Requested 12 Number Approved 0

PE's Requested 4 Number Approved 0

This applicant ranked _____ by score of _____ ___-year applicants.

This applicant ranked _____ by approval rank order of _____ __-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff: Bernice R. Retzlaff

Date: 4/24/79

GPO 887-770

It is inconceivable that
an institution located in
Puerto Rico and serving
a poor Hispanic population
that is the recipient of
BEOG awards and
come from poverty
circumstances was not
given any compensatory
points. I therefore
award item 6
bring the total
proposal points to
100

M L Brown
7/24/79

APPLICATION TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Catalog of Federal Domestic Assistance Number 13.454

APPLICANT

NAME OF APPLICANT INSTITUTION CATHOLIC U. OF P.R.	PROJECT NUMBER 454 AH90 – 495
ADDRESS LAS AMERICAS AVENUE	Level __ 2-year ✓ 4-year Control __ Public ✓ Private
CITY, STATE, AND ZIP CODE PONCE, PUERTO RICO 00731	AMOUNT REQUESTED BY APPLICANT $1,563,147

Duration of Project: Requested funds for how many years? ☐ 1 ☒ 2 ☐ 3 ☐ 4 ☐ 5

1. Do you recommend Federal support? ☐ YES ☒ NO
2. If yes is checked, amount recommended. $________
3. If yes is checked, recommend award for how many years: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5
4. Total score of the evaluation criteria 29 TEL .20

Summary Comments:

PROPOSAL DOES NOT FOLLOW GUIDELINES. THERE IS NOT SUFFICIENT INFORMATION, FOR EVALUATION. BUDGET, FOR INSTANCE, HAS NOT BEEN FULLY RATIONALIZED.

Technical Reviewer

NAME OF READER (Print) LEONEL CAMPOS	ASSIGNED READER NUMBER 27
TITLE OF READER DIRECTOR, ALAS PROGRAM (CHICAGO STATE U.)	PHONE NUMBER (312) 995-2131
BUSINESS ADDRESS OF READER (COLLEGE) 95TH ST. AT KING DR	CITY, STATE, AND ZIP CODE CHICAGO IL. 60628

I have reviewed the application in accordance with the "scope of work" that has been signed and returned to the Office of Education.

SIGNATURE Leonel Campos	DATE 2/28/79

OE FORM 1335, 4/78 (FM Control No. 39)

Rotzfall
10

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#): 454 AH 90495

2. TYPE OF REQUEST (check one): ☒ G ☐ C ☐ S ☐ R ☐ M

3. GRANT NUMBER (if C, S, R request):

4. NAME OF APPLICANT: Catholic University of Puerto Rico, PR (Ponce 00731)

5. ENTITY NUMBER (EN): 1660191765A2

6A. BUDGET PERIOD → BEGIN DATE: END DATE:

6B. PERFORMANCE PERIOD → BEGIN DATE: END DATE:

6C. PROJECT LENGTH (months): 12 Months

8. OE PROJECT OFFICER
NAME: Paul Carnall

9. GRANTEE'S PROJECT DIRECTOR
NAME: José L. Hernández
4675
(809) 844-4150 x 138

7. REPORTS	DUE DATES		
A. QUARTERLY			▨
B. SEMIANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL E. Evaluation	✓	▨	▨

10. FINANCIAL DATA

FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
1979	2003084	4151	
		10A. TOTAL →	

Bilateral PART II - BUDGET ANALYSIS Bilateral

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B 2 years	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL	1,858,480				
2. FRINGE BENEFITS	464,620				
3. TRAVEL	117,146				
4. EQUIPMENT	83,800				
5. SUPPLIES	76,321				
6. CONTRACTUAL					
12 NTF's ~~7. CONSTRUCTION~~ 4 B's	(97,200) (60,000)				
8. OTHER	219,110				
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	2,819,477	230,000			

GPMD -- ORIGINAL

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 3/77, WHICH IS OBSOLETE

STAFF TECHNICAL REVIEW

FY 1979
13.454

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Name of Applicant Institution Oakwood College - Bilateral	Project Number 454AH90 193
Address Oakwood Road Huntsville, Alabama 35806	Level ☐ 2-Year ☒ 4-Year
Title III Coordinator: Ellen J. Anderson	Control ☐ Public ☒ Private
President: Calvin B. Rock	Congressional District 5 | Region 4

Area Code	Telephone	Extension		Requested funds for how many years?
205	837-4290			3 yrs - 2,195,333

Prior Title III Funding: $ 937,000 (1978) $ 1,002,100 (1977) $ 315,000 (1976)

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report [✓ Yes] No Final Fiscal and Progress Report [✓ Yes] No

1. Was the applicant been designated as a developing institution? ☐ No ☑ Yes

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	49	40	31	XXXX	75		✓	$66,[illegible]	3
Reader	19	72	5[illegible]	XXXX	133		✓	[illegible]	1
Reader	22	69	[illegible]	XXXX	12[illegible]		✓	[illegible]	3
[illegible]	[illegible]	65	48		113			[illegible]	3
Staff	14	62	51		113		✓	[illegible]	3
[illegible]	[illegible]	63	50	-0-	113		✓	300,000	3

PIT's Requested 3 Number Approved 1 | PE's Requested 1 Number Approved 1

Bilateral

This applicant ranked ____ by score of ______-year applicants.

This applicant ranked _____ by approval rank order of _______-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff: Ann D. Bailey
Date: 11/25/79

Bules

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#) 454AH90193	2. TYPE OF REQUEST (check one) ☒ N ☐ C ☐ S ☐ R ☐ M	3. GRANT NUMBER (if C, S, R request)
4. NAME OF APPLICANT Oakwood College		5. ENTITY NUMBER (EIN) 1-63-036-6662 A1

6A. BUDGET PERIOD →	BEGIN DATE	END DATE	6B. PERFORMANCE PERIOD	BEGIN DATE	END DATE	6C. PROJECT LENGTH (months) 36

7. REPORTS		DUE DATES		
A. QUARTERLY				
B. SEMIANNUAL	✓		▨	
C. ANNUAL		▨	▨	
D. FINAL	✓	▨	▨	

8. OE PROJECT OFFICER
NAME [illegible]

9. GRANTEE'S PROJECT DIRECTOR
NAME 205-837-0380
Ellen J. Anderson

e Evaluation ✓

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	2003884	4151	1,262,000
			10A. TOTAL →	

PART II - BUDGET ANALYSIS

Financial

BUDGET OBJECT CLASS CATEGORIES A	COST REQUESTED B	COST RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPMD FOOTNOTE REFERENCE F
1. PERSONNEL	[illegible]				
2. FRINGE BENEFITS	[illegible]				
3. TRAVEL	[illegible]				
4. EQUIPMENT	[illegible]				
5. SUPPLIES	[illegible]				
6. CONTRACTUAL	[illegible]				
7. CONSTRUCTION	[illegible]				
8. OTHER	[illegible]				
9. INDIRECT CHARGES					
10. TRAINING STIPENDS					
11. [illegible]					
12. TOTAL	[illegible]	1,262,[illegible]			

OE FORM [illegible] WHICH IS OBSOLETE

GPO [illegible]

STAFF TECHNICAL REVIEW

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

FY 1979
13.454

Name of Applicant Institution Oakland City College	Project Number 454AH90 071
Address Lucretia Street Oakland City, Indiana 47660	Level ☐ 2-Year ☒ 4-Year
Title III Coordinator: —	Control ☐ Public ☒ Private
President: James W Murray	Congressional District 8th | Region 5

Area Code	Telephone	Extension		Requested funds for how many years?
	749-7161	ext 20		3 years 721,121

Prior Title III Funding: $ — (1978) $ 100,000 (1977) $ 100,000 (1976)

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report [✓ Yes] No Final Fiscal and Progress Report [✓ Yes] No

I. Has the applicant been designated as a developing institution? ☐ No ☒ Yes

a. If no, applicant could not be funded.
b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	53	72	52	XXXX	124		✓	609,596	3
Reader	57	68	45	XXXX	113		✓	358,000	3
Reader	25	62	48	XXXX	110		✓	150,000	3
X		67	48	xxx	115		✓	372,532	3
Staff	9-1-16	40	20		60	✓		---	—
App'd pts		54	39	xxx	93	☒	✓	125,000	

7/15/79

NIF's Requested _____ Number Approved _____ PE's Requested 1 Number Approved _____

This applicant ranked _____ by score of _____ ___-year applicants.

This applicant ranked _____ by approval rank order of _____ ___-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff

Date 25 April 1979

GPO 887-776

Messiah College - PA
Native American Education Services, Inc. - IL
Sioux Falls College - S.D.
Mount Mercy College - IA
Our Lady of Holy Cross College - LA
Spalding College - KY
Kansas Newman College - KS
Simpson College - IA
Lindsay Wilson College - KY
Hilbert College - NY
Copiah-Lincoln Junior College - MS
Chattanooga State Tech. Comm. College - TN
Washington International College - Bilateral - Wash. D.C.
Stillman College - TPSP - AL
Fort Wright College - WA
Warner Pacific College - OR
Albany State College - Consortium - GA
Anna Maria College - MA
University of Wisconsin-River Falls - WI
Richard Stockton College - NJ
Cornish Institute of Allied Arts - WA
Peru State College -Bilateral - NE
Central Carolina Technical Institute - NC
Patrick Henry State Junior College - AL
Bay de Noc Community College - MI
South Georgia College - Consortium - GA
Mid-Michigan Community College - MI
Iowa Lakes Community College - IA
Columbia College - SC
Mercyhurst College - PA
Friends University - KS
Concordia College - OR
Luzerne County Community College - PA

One outside reader does not
recommend any additional pts.
One outside reader suggest
3 areas that warrant such,
and the third outside
reader strongly suggest
the school should receive
7/15/79 additional points. This
M Brown latter reader checked off
all four areas. Although
the staff member felt the
$123,000 points were unwarranted,
I agree with the outside
readers and recommend a
8 pts making a total of 101
additional points

(Bilateral)

STAFF TECHNICAL REVIEW

FY 1979
13.454

TITLE III, STRENGTHENING DEVELOPING INSTITUTIONS

Name of Applicant Institution
Brevard Community College

Project Number
454AH90 147

Address 1519 Community College
Cocoa, Florida 32922

Level ☒ 2-Year ☐ 4-Year

Control ☒ Public ☐ Private

Title III
Coordinator: DR. Nicholas A Beninate.

Congressional District 9

Region 4

President:
Maxwell C. King

Area Code	Telephone	Extension
305	632-1111	238

Requested funds for how many years? 3,161,119 4 yr

Prior Title III Funding: $ 260,000 (1978) $ 266,800 (1977) $ 266,800 (1976)

If funded in FY 1977 or 1976, were satisfactory reports submitted?
Evaluation Report X Yes ___ No
Final Fiscal and Progress Report X Yes ___ No

1. Has the applicant been designated as a developing institution? ☐ No ☑ Yes
   a. If no, applicant could not be funded.
   b. If yes, reviewers recommendations follow:

Reviewers Recommendations

	Reader Number	(100) Points 169.52	(75) Points 169.53	Comm.'s 25 Points	Total	Funding Recomm. No	Funding Recomm. Yes	Amount Recommended	Number of Years Recommended
Reader	51	59	12	XXXX	71	X		0	0
Reader	61	61	55	XXXX	116		✓	1,032,300	3
Reader	6	82	56	XXXX	138		✓	3,843,119	4
Ave.		67.3	41		108			1,091,[illegible]	2
Staff	9-1-6	75	70		165		✓	300,000	~~2~~ 1 yr
Appro.	9-1-6	76	50	18	144		✓	205,000	1

NTF's Requested ______ Number Approved ______

PE's Requested ______ Number Approved ______

This applicant ranked ______ by score of ______ ___-year applicants.

This applicant ranked ______ by approval rank order of ______ ___-year applicants.

Comments must include a justification if the staff recommendation varies significantly from the reviews by field readers.

Signature of Staff Geraldine M. Jones

Date 4/25/79

GPO 937-770

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. PROCUREMENT REQUEST NUMBER (PR#) 454AH 90147	2. TYPE OF REQUEST (check one) ☒ G ☐ C ☐ S ☐ K ☐ M	3. GRANT NUMBER (if C, S, M request)
4. NAME OF APPLICANT Brevard Community College, Cocoa, Florida		5. ENTITY NUMBER (EN) 159-092-0675A1

6A. BUDGET PERIOD →	BEGIN DATE	END DATE	6B. PERFORMANCE PERIOD →	BEGIN DATE	END DATE	6C. PROJECT LENGTH (months) 12

7. REPORTS	DUE DATES			
A. QUARTERLY				8. OE PROJECT OFFICER NAME Dr. Paul V. Cassell (202) 245-2418
B. SEMIANNUAL	✓		▨	
C. ANNUAL		▨	▨	9. GRANTEE'S PROJECT DIRECTOR NAME ~~[illegible]~~ (305) 632-1111, X238
D. FINAL	✓	▨	▨	
E. Evaluation ✓				

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	3003084	41.51	
			10A. TOTAL →	

PART II - BUDGET ANALYSIS

BUDGET OBJECT CLASS CATEGORIES a	AMOUNT		PROGRAM FOOTNOTE REFERENCE d	AMOUNT NEGOTIATED e	GPMD FOOTNOTE REFERENCE f
	REQUESTED (4 yrs. requested) b	RECOMMENDED c			
1. PERSONNEL	$ 1,934,344				
2. FRINGE BENEFITS	413, 734				
3. TRAVEL	86, 497				
4. EQUIPMENT	65, 564				
5. SUPPLIES	60, 670				
6. CONTRACTUAL	320, 812				
7. ~~CONSTRUCTION~~ N.T.F.'s	(-0)				
8. OTHER	291, 498				
9. INDIRECT CHARGES					
10. TRAINEE COST/ STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	$ 3,163,119	$ [illegible]			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

GPMD – ORIGINAL

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS	PART III – PROGRAM DOCUMENTATION

PROJECT OFFICER RECOMMENDATIONS FOR BUDGET REVISIONS AND MINOR WORK SCOPE ADJUSTMENTS *(The Project Officer should include recommended budget revisions with complete rationale which are (1) in accordance with the program regulations and evaluation criteria; (2) in accordance with the reviewers' and Staff Technical Review Summary comments; and (3) would not affect the application's ranking. In addition, the Project Officer may raise any questions or issues necessary for the Grants Specialist to conduct negotiations)*

Approved Activities and Funding Levels include:
1) Title III Office $75,000
2) Instructional Services Pgm. 75,00
3) Student Services Pgm. $75,000
4) Admin. Improvement Pgm. $75,00

Disapproved Activities - None

7/27/79
DATE

Peggy J. Whitehead for Geraldine Jones
SIGNATURE OF OE PROJECT OFFICER

OE FORM 5378-1, 12/77

GPMD

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202
GRANT APPLICATION FOR STRENGTHENING DEVELOPING INSTITUTIONS PROGRAM
(Title III, Higher Education Act, 1965, Public Law 89-329, as amended)

ACTIVITY NUMBER: 1
PAGE NO.: 1
NUMBER OF PAGES: 2
FORM APPROVED OMB NO. 51-R0786
PART V-II PROGRAM BUDGET (Section C)

SECTION C – ACTIVITY BUDGET *(to be completed for each major activity for which funding is requested in this application)*

1. NAME OF APPLICANT INSTITUTION: BREVARD COMMUNITY COLLEGE, COCOA, FLORIDA 32922
2. ACTIVITY TITLE: STUDENT SERVICES
3. BUDGET CATEGORY BY YEAR

a. Personnel: list all position titles, such as program coordinator, etc. Consolidate secretarial and clerical support in one line item. (Do not include consultants.)

POSITION TITLE	FIRST YEAR				SECOND YEAR				THIRD YEAR				FOURTH YEAR				FIFTH YEAR				TOTAL		
	NUMBER		SDIP	OTHER SOURCES	NUMBER		SDIP	OTHER SOURCES	NUMBER		SDIP	OTHER SOURCES	NUMBER		SDIP	OTHER SOURCES	NUMBER		SDIP	OTHER SOURCES	NO. FTE	SDIP	OTHER SOURCES
	FT	FTE			FT	FTE			FT	FTE			FT	FTE			FT	FTE					
Coordinator	1		20,000		1		21,000		1		22,050		1		23,153						4	86,203	
Secretary I	1		7,000		1		7,350		1		7,718		1		8,104						4	30,172	
Campus Deans		0.6		13,800		0.6		14,490		0.6		15,215		0.6		15,976							59,481
Counselors		3.0		66,000		3.0		69,300		3.0		72,765		3.0		76,404							284,469
Advisors		1.5		13,500		1.5		14,175		1.5		14,884		1.5		15,629							58,188
Specialists	8		72,000		8		75,600		8		59,535	19,845	8		41,674	41,675					32	248,809	61,520
Systems Analyst	1		16,500		1		17,325		1		14,554	3,638	1		11,461	7,641					4	59,840	11,279
Instructors	5		57,500		5		70,875		5		69,322	14,833	5		39,070	39,070					20	236,767	53,903
Data Technician	1		9,000		1		9,450		1		7,938	1,985	1		6,251	4,168					4	32,639	6,153
Data Programmer	1		15,500		1		16,275		1		13,671	3,418	1		10,766	7,177					4	56,212	10,595
Student Assistant	5		11,200		10		22,400		1	2.5	16,800	5,600	1		11,200	11,200					35	61,600	16,800
Clerk-Typists	3		20,400		3		21,420		1		16,868	5,623	3		11,808	11,808					12	70,496	17,431
SUB-TOTAL	▨	▨	229,100	93,300	▨	▨	261,695	97,965	▨	▨	218,456	157,806	▨	▨	163,487	230,748	▨	▨			▨	882,738	579,819
b. Fringe Benefits	▨	▨	51,405	20,060	▨	▨	56,264	21,032	▨	▨	46,968	33,928	▨	▨	35,149	49,611	▨	▨			▨	189,787	124,631
c. Travel	▨	▨	3,244	—	▨	▨	874	—	▨	▨	734	—	▨	▨	479	—	▨	▨			▨	5,331	—
d. Equipment	▨	▨	17,500	—	▨	▨	—	—	▨	▨	—	—	▨	▨	—	—	▨	▨			▨	17,500	—
e. Supplies	▨	▨	3,300	—	▨	▨	4,600	—	▨	▨	4,600	—	▨	▨	4,600	—	▨	▨			▨	17,100	—
f. Contractual	▨	▨	—	—	▨	▨	—	—	▨	▨	—	—	▨	▨	—	—	▨	▨			▨	—	—
g. Other	▨	▨	18,888	—	▨	▨	32,132	—	▨	▨	32,132	—	▨	▨	32,132	—	▨	▨			▨	115,284	—
h. Total Direct Charges	▨	▨	323,438	113,360	▨	▨	355,565	119,027	▨	▨	302,890	191,734	▨	▨	235,847	280,359	▨	▨			▨	1,227,740	704,[illegible]

4. PAYMENTS TO ASSISTING INSTITUTIONS AND AGENCIES (Name)	FIRST YEAR		SECOND YEAR		THIRD YEAR		FOURTH YEAR		FIFTH YEAR		TOTAL	
	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES

OE FORM 1049-1, [illegible]

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DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

GRANT APPLICATION FOR STRENGTHENING DEVELOPING INSTITUTIONS PROGRAM
(Title III, Higher Education Act, 1965, Public Law 89-329 as amended)

ACTIVITY NUMBER	PAGE NO.	FORM APPROVED OMB NO. 51-R0000
0	1	
	NUMBER OF PAGES 2	PART VIII PROGRAM BUDGET (Section C)

SECTION C – ACTIVITY BUDGET *(To be completed for each major activity for which funding is requested in this application)*

1. NAME OF APPLICANT INSTITUTION: BREVARD COMMUNITY COLLEGE, COCOA, FLORIDA 32922

2. ACTIVITY TITLE: TITLE III DIRECTORS OFFICE

3. BUDGET CATEGORIES BY YEAR

a. Personnel *(List all position titles, such as program coordinator, etc. Consolidate secretarial and clerical support in one line item. Do not include consultants.)*

POSITION TITLE	FIRST YEAR				SECOND YEAR				THIRD YEAR				FOURTH YEAR				FIFTH YEAR				TOTAL		
	NUMBER FT	NUMBER FTE	SDIP	OTHER SOURCES	NUMBER FT	NUMBER FTE	SDIP	OTHER SOURCES	NUMBER FT	NUMBER FTE	SDIP	OTHER SOURCES	NUMBER FT	NUMBER FTE	SDIP	OTHER SOURCES	NUMBER FT	NUMBER FTE	SDIP	OTHER SOURCES	NO. FTE	SDIP	OTHER SOURCES
Director, Title III	1		25,000		1		26,250		1		27,563		1		28,941						4	107,754	
Secretary II	1		7,800		1		8,190		1		8,600		1		9,030						4	33,620	
SUB-TOTAL			32,800	—			34,440	—			36,163	—			37,971	—						141,374	—
b. Fringe Benefits			7,052	—			7,405	—			7,775	—			8,164	—						30,396	—
c. Travel			1,925	—			2,470	—			2,680	—			3,000	—						10,075	—
d. Equipment			15,564	—			—	—			—	—			—	—						15,564	
e. [illegible]			1,500	—			1,100	—			1,100	—			1,100	—						4,800	—
f. [illegible]			17,703	—			10,703	—			10,703	—			8,703	—						47,812	—
g. [illegible]			[illegible]	—			915	—			915	—			915	—						3,660	—
h. Total Direct Charges			77,459	—			57,033	—			59,336	—			59,853	—						248,631	—

4. PAYMENTS TO ASSISTING INSTITUTIONS AND AGENCIES (Name)	FIRST YEAR		SECOND YEAR		THIRD YEAR		FOURTH YEAR		FIFTH YEAR		TOTAL	
	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES	SDIP	OTHER SOURCES
External Evaluator Enterprises for New Directions, Inc., Washington, D.C.	12,000	—	10,000	--	10,000	—	8,000	—			40,000	—

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Additional Submissions of Dr. Leonard H.O. Spearman

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
BUREAU OF HIGHER AND CONTINUING EDUCATION
WASHINGTON, D.C. [illegible]

December 10, 1979

Honorable Max Baucus
Chairman, Subcommittee on Limitations
of Contracted and Delegated Authority
United States Senate
Committee on the Judiciary
Washington, D.C.

Dear Senator Baucus:

During your hearing on November 14 in which you inquired about a list of institutions recommended for increases, I am forwarding as you requested copies of the appropriate memoranda from the Office of the Deputy Commissioner to the Director, Grants and Procurement Management Division. The first memorandum concerns an increase for Boricua College. The second is a memorandum listing 14 additional institutions. A third memorandum from Ms. Loretta Wawrzyniak, Acting Chief, Program Operations Section, Division of Institutional Development, verifies that the funding documentation was forwarded to Arthur Stewart of GPMD.

To recall that portion of my testimony, we were informed on eitner the 23rd or the 24th of September that approximately $1.3 million would be returned to the Treasury following the grant negotiations for the FY 1979 Title III awards. The two cited memoranda involved increases in the amount of $965,322. On September 28, Mr. Will informed me that he could not process the total request and asked that we prioritize the recommendations to include no more than 5 institutions, as I recall. The document you asked me to comment on was transmitted to Mr. Will about 5:30 on Friday, September 28.

If you have further questions on this matter, I will be happy to provide additional information.

Yours very truly,

Leonard H.O. Spearman
Associate Deputy Commissioner
for Higher and Continuing Education

Enclosures

DATE: SEP 2 6 1979

TO : Mr. Frederick Will, Director
Grant and Procurement Management Division

FROM : Deputy Commissioner for
Higher and Continuing Education

SUBJECT: Revisions to the Title III, HEA, FY 1979 Four-Year Slate

This memorandum effectuates minor revisions in the amount that is approved for FY 1979 grants for the following institutions:

Institution	Current Amount	Approved Increase	Total Amount FY 1979 grant	Amt. Requested for 1st Year
Baker Haskell Univ., KS	$149,000	$ 38,000	$187,000	$ 326,023
Carroll College (Cons.), MT	215,000	19,000	234,000	393,143
College of Santa Fe, NM	450,000	40,000	490,000(2 Yrs)	346,349
Dakota Wesleyan, SD	303,000	23,000	326,000(2 Yrs)	295,755
Edward Waters College, FL	840,000	144,000	984,000(2 Yrs)	462,825
Freed Hardeman College, TN	150,000	115,322	265,322	975,462
Knoxville College, TN	300,000	100,000	400,000(1 Yr)	862,812
Mary College, ND	600,000	34,000	634,000(2 Yrs)	753,879
McPherson College (ACCK), KS	212,000	38,000	250,000	761,865
Medgar Evers College, NY	400,000	50,000	450,000	772,794
Roosevelt University, IL	250,000	50,000	300,000	1,006,397
Tennessee St. Univ., TN	269,000	62,000	331,000	1,039,780
West Va. Wesleyan College, WV	150,000	30,000	180,000	503,588
Western New Mexico Col., NM	400,000	66,000	466,000(2 Yrs)	430,536

Funding documentation for each of the approved increases will be transmitted to your office by tomorrow.

(sgd.) Alfred L. Moye

Alfred L. Moye

VHo:sm
9/24/79

DATE: SEP 2 6 1979

TO : Mr. Frederick Will, Director
Grant and Procurement Management Division

FROM : Deputy Commissioner for
Higher and Continuing Education

SUBJECT: Revisions in the Title III, HEA, FY 1979 Two-Year Slate

This memorandum effectuates minor revisions in the amount that is approved for FY 1979 grants for the following institutions:

	Current Amount	Approved $Increase	Total Amount FY 1979 Grant	Amt. Requested for 1st Year
Boricua College, NY	$174,000	$136,000	$310,000	$704,016

Funding documentation for each of the approved increases will be transmitted to your office by tomorrow.

(sgd.) Alfred L. Moyé

Alfred L. Moyé

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION

DATE: November 19, 1979

FROM : Ms. Loretta A. Wawrzyniak, Acting Chief
Program Operations Section

TO : Dr. Leonard H. Spearman
Associate Deputy Commissioner

SUBJECT : Funding Documentation forwarded to Arthur Stewart
on September 26, 1979.

Funding documentation was forwarded to Arthur Stewart on revisions to the FY 1979 Four-Year Slate as referenced in the September 24, 1979, Memorandum from the Deputy Commissioner to Fred Will. This documentation was sent as per instructions.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
BUREAU OF HIGHER AND CONTINUING EDUCATION
WASHINGTON, D.C. [illegible]

DEC 2 1 1979

The Honorable Senator Max S. Baucus
Chairman, Sub-Committee on Limitations
of Contracted and Delegated Authority
Committee on the Judiciary
United States Senate
Washington, D.C. 20510

Dear Senator Baucus:

During my testimony before your subcommittee on November 14, 1979, I promised to supply--for the record--a statement clarifying the Title III funding issues regarding Durham College and Canisius College. This letter constitutes my official response to that commitment.

1. Durham College

Durham College was recommended for a FY 1979 Title III award by the Division of Institutional Development staff. However, as the staff began to develop funding recommendations for the FY 1979 grantees, we learned that the institution was experiencing accreditation problems and therefore may not be eligible to receive a Title III award.

Because the legal issue upon which this decision rested was not resolved at the time we were obliged to forward the final recommended funding slate to the Grants Procurement Management Division (GPMD), we included Durham College on the list, but asked that GPMD "freeze" the Durham grant award until such time as all of the legal questions were answered.

Once we determined that the College had, in fact, lost its accreditation and were advised by counsel that we could not fund (under current Title III regulations), a specific accredited program in an institution that is not otherwise accredited we did not award a FY 1979 Title III grant to Durham College.

2. Canisius College

Our review of the FY 1979 Canisius College Title III application and review package revealed the following:

-- Program Eligibility: As a former AIDP recipient, Canisius College was grandfathered into program eligibility for FY 1979.

-- Reader Evaluations: Two (2) external field readers recommended the institution for funding and one external field reader and the staff reader did not recommend the College for funding. However, the two readers who did not recommend funding for Canisius based their recommendation, largely, on their perceptions that (a) Canisius serves comparatively few low-income students, and (b) the College should not be eligible for Title III. Thus, their reactions were largely subjective and technically moot since Canisius was grandfathered in.

The readers who recommended funding for Canisius did so because they were impressed with the quality of the institution's proposal. They stated, in their evaluation forms, that the activity goals and objectives were appropriate and well defined, and that the costs, administration and evaluation of the proposed activities appeared to be reasonable.

Hence, because the readers who did not recommend funding based their decision on an "eligibility issue" (which did not properly fall within their purview), the effect of their recommendations were temporized and entirely offset by the thoughtful, appropriate and positive evaluations of the readers who did recommend funding.

-- Proposal Evaluation: Canisius College received an appropriate score of 125 points and the institution's final rank order score was 135.5 of 272 applicants.

-- FY 1979 Award: Canisius received a one-year Title III award in the amount of $380,000.

Finally Senator Baucus, may I take this opportunity to amend a most grievous error committed by Dr. Edward Brantley, former Director of the Division of Institutional Development. During his testimony in the November 14th subcommittee hearings, Dr. Brantley was asked if he could supply for the record data on the total amount of travel funds expended by Title III grantee institutions and the participating assisting agencies. Dr. Brantley indicated that this information is available and that he would submit same for the record.

Unfortunately, my investigation into this matter reveals that Dr. Brantley was clearly in error. In point of fact, the information you requested is not readily available for the following reasons:

-- Accurate grantee travel expenditures would have to be drawn from revised institutional award budgets. To date, all grantee institutions have not submitted revised budgets.

-- The Title III staff do not have immediate access to the revised budgets which have been submitted. (In point of fact, these budgets are submitted directly to the Grants Procurement and Management Division.)

-- OE does not have access to all assisting agency budgets.

-- These data have not been uniformly collected and/or compiled in the past.

If your intent in requesting this information is to simply get some idea of the dimensions involved, we will be happy to provide this data on any specific institutions or assisting agencies you wish to select. However, if you still wish to have the complete information you requested, please know that in light of our deep involvement in processing this year's grants we may not be able to fully comply with your request for another 60-90 days.

I trust this letter provides you with the information you desired. Should you have additional questions or concerns, please do not hesitate to contact me immediately.

Sincerely yours,

Alfred L. Hoye
Deputy Commissioner for
Higher and Continuing Education

cc: Dr. Mary F. Berry
Assistant Secretary for Education

Additional Submissions of Alfred L. Moye

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
BUREAU OF HIGHER AND CONTINUING EDUCATION
WASHINGTON, D.C.

January 31, 1980

Honorable Max Baucus
Chairman
Subcommittee on Limitations of
Contracted and Delegated Authority
United States Senate
Washington, D. C.

Dear Senator Baucus:

Please find attached a copy of a narrative statement which I want to enter into the Official Record on the hearings of your subcommittee on the Strengthening Developing Institutions Program, Title III, of the Higher Education Act of 1965, as amended. I trust you will comply with my wish to enter this statement into the Official Record.

Also, I am including copies of correspondence between Dr. Brantley and me regarding the kinds of scoring discrepancies which I discovered upon reviewing the initial work sheet presented to me. This is a graphic example of the nature of the inconsistent staff work which necessitated that Dr. Spearman and I become involved in the process. Thus, I am sharing this data with you for information only.

I request that these materials not be included in the Official Record because it contains the specific names of institutions and Title III staff members whom I have no desire to injure or embarrass. I am confident you will understand this.

May I thank you in advance for your consideration in this matter. Should you require additional information or materials, please contact me immediately.

Sincerely,

Alfred L. Moye

Alfred L. Moyé
Deputy Commissioner for
Higher and Continuing Education

Attachment

Statement of Dr. Alfred L. Moyé

Deputy Commissioner for Higher and Continuing Education

U.S. Office of Education

With the permission of the Chairman, I should like to take this opportunity to introduce this statement into the official hearings of this subcommittee on the Strengthening Developing Institutions Program, Title III, of the Higher Education Act of 1965, as amended.

I serve as the Deputy Commissioner for Higher and Continuing Education. In this capacity, I am responsible for five major divisions (employing 300 people), which administer 22 discretionary grant programs involving approximately 400 million dollars annually. The Strengthening Developing Institutions Program (Title III) is, one of the programs over which I have direct administrative and supervisory responsibility.

The Title III program is one of the largest programs administered in the Bureau of Higher and Continuing Education and is clearly one of our most complex. It is the only discretionary program in the Office of Education which provides any form of broad assistance to postsecondary educational institutions. The program was originally conceived by the Congress as a mechanism to assist small and struggling Black institutions in the aftermath of the passage of the Civil Rights Act of 1964. In the various reports and debates on the Higher Education Act of 1965, the record reflects that the Congress viewed this program as one of general assistance for a select group of postsecondary educational-institutions that were, by statutory definition, "for financial or other reasons, struggling for survival and isolated from the main currents of academic life."

The obvious ambiguity of this language has served to haunt U.S.O.E. officials as they attempted to implement this program. This ephemeral definition presented the Office of Education with a difficult and particularly vexing problem - the definition of a struggling institution. It is clear that the program is not designed to assist the majority of our great public and private universities. Yet one must still apply careful judgment in determining the other reasons which cause an institution to be in a state of fiscal stress or what factors other than geographic location characterize an institution as "isolated from the main currents of academic life."

Paradoxically, even though Title III was created in 1965, the first regulations for the program were not published until 1975. In these regulations, eligibility to participate in the program was determined from a group of quantitative and qualitative factors which seem to have been a composite of institutional characteristics of colleges and universities that participated in the program during the 1972 program year. (I say "seem to have been" simply because I was not associated with OE in 1975 and thus was not privy to the conversations or thinking which resulted in the first-time program regulations.)

During the past two years or so, we were advised by our Office of General Counsel -- on several different occasions -- that the eligibility factors cited in the regulations were outdated and possibly could not be legally defended. The process of developing the new regulations within the Department was prolonged. Hence, it was in this environment that the first GAO Report on Title III was published. That report addressed, as you know, precisely the same issues that we in OE had previously identified and were in the process of reconciling, e.g., needed regulatory changes, a clear definition of eligibility requisities and strategies for improving the management of the program.

Finally, during the summer of 1978, when the regulations for the Title III program were chosen to be rewritten under Operation Common Sense, the Bureau insisted that the rewrite ought to go beyond language changes to include a fundamental overhaul. We argued for more definitive regulations becuase of the following factors:

--In 1973, we administratively created two components for the program. A Basic Institutional Development Program (BDIP) made single year awards to one set of institutions, and the Advanced Institutional Development Program (AIDP) made multi-year awards to a group of institutions that were viewed as being significantly stronger. By 1978, it was clear to many of us that this distinction was artificial and in need of rethinking.

--Because we had such a small professional staff to monitor an extremely complex program, we believed that the consolidation of the BIDP and AIDP components into one single program would be the most effective way to utilize an already overburdened staff.

--As shifts in the economy of the country occurred changes in the emphases of the program seemed warranted. Many of the developing institutions were severely troubled as the result of spiraling inflation and the impact of declining enrollments.

--Our analysis of the second GAO draft report suggested that we should respond positively to many of the recommendations offered, e.g., the requirements for program eligibility and more effective program management.

Thus, the proposed regulations were published in late November, 1978. Applications were invited for the FY 79 competition for funds based on this document. The proposed rules quickly became the source of controversy because: (1) a significant number of institutional representatives believed that the shift to student characteristics and fiscal stability (BEOG, and E and G expenditures per full-time student) were not the clearly discernible factors which isolated one set of institutions from another; and (2) some institutions which had previously participated in the program were no longer eligible under our new requirements.

As a result, the Congressional authorizing committees strongly recommended that the final regulations (published in late March, 1979) be modified to make all institutions which had participated in the program in fiscal year 1978 eligible institutions. Obviously, one immediate result of this decision to "grandfather" institutions was to re-open the application process for these institutions. This caused a significant delay in announcing grant awards because of the need to allow for an additional time period for the newly eligible institutions to develop FY 1979 applications for submission, and for the OE review of same.

The net effect, resulted in a delay in the process of granting awards which led to the chaotic state of affairs in which we found ourselves during the months of August and September.

During the investigation, I have been invited to appear as a witness in two different hearings. Although these hearings have been conducted in a fair and impartial manner, some of the testimony presented has been self-serving, slanted and uninformed. In addition, during the subcommittee staff's investigation, it is important for you to understand that my staff has unfairly suffered, I believe, a great deal of personal abuse and has been subjected to personal rancor by some members of your investigatory staff. Suffice it to say that I could be quite specific, if necessary. However, I want to make the point that the manner in which this investigation was conducted by the subcommittee staff was not consistent with my perception of the dignity and stature of a Subcommittee of the United States Congress.

The criticisms directed toward the program during your subcommittee's hearings can be broadly categorized under two specific issues:

> First, it has been alleged that the program managers have exercised discriminatory treatment vis-a-vis the institutions which have applied for support under these programs. Specifically,

it has been suggested that (a) predominantly minority institutions and (b) institutions for which there was strong Congressional support (described as congressional pressure) have received "favorite status" treatment in eligibility determinations, the grant review process, and in funding decisions.

Second, it has been alleged that the Office of the Deputy Commissioner, BHCE, engaged in an abuse of discretion by indiscriminately manipulating the recommendations presented by the program staff after the completion of the approved grant review process. In both the unfavorable press and the several Congressional hearings on the program the Deputy Commissioner and his immediate staff were charged with ignoring these recommendations and substituting their own judgments.

Neither of the allegations described above has any merit. It is not true that the program's managers have accorded "favorite status" to any group or class of institutions. Nor is there any truth to the charge that I -- or members of my immediate staff -- arbitrarily or capriciously manipulated the grant award recommendations presented by the Title III staff.

However, germane to a discussion of the funding problems which occurred in the FY 1979 application review and funding process and which led to the allegations earlier discussed would be a brief chronology of actual events:

--The long delay in getting the new regulations cleared through the Department of Health, Education, and Welfare resulted in the publication of Proposed Rules and Final Regulations on March 30 -- a very late date in terms of institutional calendars;

--The necessity for "grandfathering" certain institutions which lost program eligibility in the proposed rules now required a reopening or the competition for funds after both external and staff readers had already completed their evaluation of all applications received by the original February 2 deadline. The result of the grandfathering process, the need to evaluate new applications -- these factors delayed the grant announcements by at least 2 months; and

--Inconsistent program staff work required an additional month to effect a variety of computation corrections to the work sheets presented before a final slate could be developed and approved by my office.

In both my testimony before the subcommittee and in this narrative statement, I have alluded to the poor quality of the staff work presented to me which necessitated my directive that Dr. Spearman get on top of the process, and which later resulted in my personal involvement. For the record, it may prove illuminative if I describe here some of the more conspicuous examples of what I have described as poor staff work:

(1) Under our program regulations, institutions which did not receive an average of 50 points by the external field readers

on the basis of section 169.52 (application review criteria) of the program's regulations were to be removed from the competition. However, the program staff decided to have the external reviewers read and rate both section 169.52 and 169.53 (program priorities). Hence, the scores presented to me did not distinguish between the two: Thus, all low scores had to be checked. The point is that the staff erred in conducting the process, and there was a significant need to review all scores, particularly to verify computation errors or extreme variations in scores which further delayed the process.

(2) We were criticized for funding institutions which were not recommended for funding by the field readers.

In our evaluation plan we stated that we would use only numerical scores in ranking the applications. (We decided upon this approach deliberately to avoid inconsistencies between the scores assigned by readers and their funding recommendations.) Yet, I learned that the staff decided to ask for funding recommendations (e.g., R for proposals recommended for funding and NR for proposals not recommended for funding) as guidance. As a result, one of the grandfathered institutions, for example, which coincidentally received a total of 225 points of the quantitative eligibility factors, received a proposal score of 125 points -- well above the cutoff of 100 points for funding consideration. But 2 field readers did not recommend the institution for funding because they felt that the institution was too advanced for SDIP funding. We disregarded the reader's recommendations in this instance and relied on the rank order score because program eligibility is not a funding criterion.

(3) We were criticized for recommending more or less money than staff or field readers recommended.

It is important to note that staff readers and field readers individually review only a small percentage of the total applications submitted. Last year, for example, we received over 500 applications with institutional requests exceeding 520 million dollars. Thus, one must realize that their individual recommendations may make a great deal of sense in the narrow context of the proposals they individually review -- but are frequently unrealistic when weighed against all requests.

Further, I must stress that the staff attempted to devise a formula award system for a discretionary grant program and they wanted to apply that formula rigorously. We felt it necessary to reject that system when the results of same were presented to us on the initial worksheets because (a) it did not consider the impact of the level of funding on the institution especially when considering particularly large increases or decreases in the recommended award (for example: a small institution whose Title III grant was 80% salary expense could be severely hurt by a drastic cut in funding on short notice, or the institution could be placed in a precarious position if it received a large increase which would have encouraged it to add staff without a mechanism to absorb them should federal funds disappear; (b) the original funding formula benefitted institutions who asked for the most money -- the quality of application notwithstanding; and (c) by using the amount requested to trigger the formula funding approach, the mechanism did not allow for the elimination of the funding of activities which were disallowed by staff and external reviewers. This is a significant problem. An applicant institution may apply for as many as 20 or more activities to be supported by Title III funds. If we have universal consensus that a specific activity should be funded, we still must resolve the problem of the recommended funding level since readers will often recommend between maximum and minimum support. It is more complicated when two readers approve an activity and the other two do not. How does one compute the dollar figure? It is important to remember that by law, Title III supports approved and recommended institutional activities -- not general institutional support.

(4) We also found examples of unexplained discrepancies in the work sheets presented to us. For example, in one application the average field reader score was 130 points, and the staff reader score was 100 points. Yet, the appropriate score assigned to the application (which actually determines the rank order for the final slate) was 75. How such a disparate appropriate score was arrived at was -- and continues to be -- a real mystery to us.

(5) In other cases, we found serious inconsistencies between field reader and staff reader scores. In one instance, the average

field reader score was 131 and the staff reader score was 39. Hence, we were puzzled as to how an application could be reviewed so consistently by three individual external field readers, and so disparately by a staff reviewer. (Examples of this kind were numerous and obviously distressing.)

(6) Under Section 169.53(b)(1) of the regulations, the Commissioner may award up to 25 points if an institution, among other criteria, serves a disproportionate number of low-income students. We were, therefore, bothered by the fact that institutions which scored high on the quantitative program eligibility factors were not given consideration for "Commissioner's points" by the staff. Let me cite a graphic example: one institution received 280 points out of 300 points on the quantitative factors (evidencing the fact that it is serving a significantly large number of low-income students and is struggling), yet received no commissioner's points! In fact, we had to ask that the original work sheets which we examined be revised to reflect whether these points had or had not been awarded. There was no initial evidence.

(7) In every phase of the application review process, much of the staff work was unacceptable. The initial work sheets we received were replete with mathematical errors, devoid of substantive comments vis-a-vis justification for recommending or not recommending an award, and generally inconsistent with the overall application review plan initiated by the Division and approved by this Office, GPMD, and the Office of General Counsel.

I could go on and on with examples of the kind of inequities and systematic discrepancies which necessitated the personal involvement of Dr.

Spearman and me in this process. However, I believe my point is made. As Deputy Commissioner, it was incumbent upon me to correct errors, clarify inconsistencies and present to the Executive Deputy Commissioner a defensible slate which was fair and equitable. Hence our intervention.

In our review, we asked the staff to re-review any application which seemed to be questionable with regard to the discrepancies and inconsistencies earlier noted and to justify their recommendations. Often this required a second review by the Branch Chief or someone he appointed. In no case was a decision arbitrarily rendered by me. In every case, however, Dr. Spearman and I attempted to use our best professional judgment to assure a fair and equitable distribution of funds.

Finally, let me state that the most depressing element present throughout this subcommittee's investigation and hearings is the conspicious absence of a balanced point of view. It is true that this program has had more than its share of problems. These problems have been widely reported. However, it is also true that we had taken great strides to improve the operation and administration of this program long before this subcommittee became interested in it. The administrative improvements made in the program have been outlined in the testimony of Dr. Berry and Mr. Pickman. This subcommittee has, I believe, my three action plans which I forwarded to Dr. Berry, Assistant Secretary for Education in July 1979 describing our improvement steps. Also, you have the various memoranda I forwarded to Dr. Brantley and others which reflect my concern for avoiding the problems we experienced in the

FY 1979 application review process. Thus, in a sense of fundamental decency and in the spirit of integrity which is representative of this body, I simply ask that the final record manifest the balance which accurately exemplifies our internal efforts to enhance the operation of this significant program.

I conclude by reiterating that this is indeed a complex program and a vital one. I stand on my earlier statements that there have been no attempts to be capricious, arbitrary or manipulative in our oversight responsibilities for this program. Rather, I emphasize that it is important for our critics -- and our overseers -- to functionally understand the needs of the higher educational community we serve, and to recognize that while commonalities do exist among institutions, each is separate with its own unique characteristics and needs. Above all else, it is important to recognize that discretion is not in and of itself inconsistent or dangerous in a discretionary grant program managed by individuals with deep convictions, a full understanding of program needs and priorities, and a fundamental sense of equity. Such are the characteristics displayed, I believe, by all of the people whom are involved in this important effort.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
BUREAU OF HIGHER AND CONTINUING EDUCATION
WASHINGTON, D.C. [illegible]

DEC 21 1979 JAN -3 [illegible]

The Honorable Senator Max S. Baucus
Chairman, Sub-Committee on Limitations
 of Contracted and Delegated Authority
Committee on the Judiciary
United States Senate
Washington, D.C. 20510

Dear Senator Baucus:

During my testimony before your subcommittee on November 14, 1979, I promised to supply--for the record--a statement clarifying the Title III funding issues regarding Durham College and Canisius College. This letter constitutes my official response to that commitment.

1. Durham College

Durham College was recommended for a FY 1979 Title III award by the Division of Institutional Development staff. However, as the staff began to develop funding recommendations for the FY 1979 grantees, we learned that the institution was experiencing accreditation problems and therefore may not be eligible to receive a Title III award.

Because the legal issue upon which this decision rested was not resolved at the time we were obliged to forward the final recommended funding slate to the Grants Procurement Management Division (GPMD), we included Durham College on the list, but asked that GPMD "freeze" the Durham grant award until such time as all of the legal questions were answered.

Once we determined that the College had, in fact, lost its accreditation and were advised by counsel that we could not fund (under current Title III regulations), a specific accredited program in an institution that is not otherwise accredited we did not award a FY 1979 Title III grant to Durham College.

2. Canisius College

Our review of the FY 1979 Canisius College Title III application and review package revealed the following:

-- Program Eligibility: As a former AIDP recipient, Canisius College was grandfathered into program eligibility for FY 1979.

-- Reader Evaluations: Two (2) external field readers recommended the institution for funding and one external field reader and the staff reader did not recommend the College for funding. However, the two readers who did not recommend funding for Canisius based their recommendation, largely, on their perceptions that (a) Canisius serves comparatively few low-income students, and (b) the College should not be eligible for Title III. Thus, their reactions were largely subjective and technically moot since Canisius was grandfathered in.

The readers who recommended funding for Canisius did so because they were impressed with the quality of the institution's proposal. They stated, in their evaluation forms, that the activity goals and objectives were appropriate and well defined, and that the costs, administration and evaluation of the proposed activities appeared to be reasonable.

Hence, because the readers who did not recommend funding based their decision on an "eligibility issue" (which did not properly fall within their purview), the effect of their recommendations were temporized and entirely offset by the thoughtful, appropriate and positive evaluations of the readers who did recommend funding.

-- Proposal Evaluation: Canisius College received an appropriate score of 125 points and the institution's final rank order score was 135.5 of 272 applicants.

-- FY 1979 Award: Canisius received a one-year Title III award in the amount of $380,000.

Finally Senator Baucus, may I take this opportunity to amend a most grievous error committed by Dr. Edward Brantley, former Director of the Division of Institutional Development. During his testimony in the November 14th subcommittee hearings, Dr. Brantley was asked if he could supply for the record data on the total amount of travel funds expended by Title III grantee institutions and the participating assisting agencies. Dr. Brantley indicated that this information is available and that he would submit same for the record.

Unfortunately, my investigation into this matter reveals that Dr. Brantley was clearly in error. In point of fact, the information you requested is not readily available for the following reasons:

-- Accurate grantee travel expenditures would have to be drawn from revised institutional award budgets. To date, all grantee institutions have not submitted revised budgets.

-- The Title III staff do not have immediate access to the revised budgets which have been submitted. (In point of fact, these budgets are submitted directly to the Grants Procurement and Management Division.)

-- OE does not have access to all assisting agency budgets.

-- These data have not been uniformly collected and/or compiled in the past.

If your intent in requesting this information is to simply get some idea of the dimensions involved, we will be happy to provide this data on any specific institutions or assisting agencies you wish to select. However, if you still wish to have the complete information you requested, please know that in light of our deep involvement in processing this year's grants we may not be able to fully comply with your request for another 60-90 days.

I trust this letter provides you with the information you desired. Should you have additional questions or concerns, please do not hesitate to contact me immediately.

Sincerely yours,

Alfred L. Moye
Deputy Commissioner for
Higher and Continuing Education

cc: Dr. Mary F. Berry
Assistant Secretary for Education

Additional Submissions of Mary F. Berry

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE ASSISTANT SECRETARY FOR EDUCATION
WASHINGTON, D.C. 20202

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Senator Max Baucus, Chairman
Subcommittee on Limitations of
  Contracted and Delegated Authority
Committee on the Judiciary
U.S. Senate
Washington, D.C. 20510

Dear Senator Baucus:

During my November 14 testimony before the Subcommittee, I indicated I would transmit to you the following documents relating to the Title III assisting agencies:

- July 11, 1979, assignment for issues papers (Copies of three resulting plans were provided to your staff earlier.) (TAB A)
- Audit Schedule for Title III (TAB B)
    - -- assisting agencies
    - -- schools
- Program Review/Monitoring Schedule for Title III schools

These materials are enclosed.

Also enclosed at TAB D is a tentative schedule of Title III institutions slated to receive site visits by June 30, 1980.

Sincerely,

Mary F. Berry
Assistant Secretary
for Education

Enclosures

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

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NOTE TO AL MOYE

At the close of the July 11 meeting with Mary Berry on Title III assisting agencies, it was agreed that you would develop a paper addressing the issues raised in the meeting and that this paper would be reviewed by Jim Pickman and John Ellis. Mary's note on this question is attached.

Based on that discussion and our conversation with Mary last night, the issues paper should address the following:

Fm
- The goal of improving financial management at Title III institutions.
- How OE can achieve this goal.
    - Fm -- Do we need statutory changes? Are our reauthorization proposals adequate? What, if any, specific changes would you recommend?
    - Fm -- Can the provisions of current regulations be used to encourage/assure improvements in financial management? Are regulatory changes needed?
    - Fm. -- Should new requirements be included in notice of closing date language or in instructions to applicants for next year's applications? What would be the nature of these requirements?
        - Fm -- Would we ask applicants to describe existing management systems, identify problems and propose remedies?
        - Fm. -- Can we insist that applications include proposals to evaluate existing systems?
- How would OE monitor progress toward improved management?
    - Fm -- Who would review financial management proposals contained in Title III applications?

- Who should assist institutions in making improvements?
  - Assisting agencies
  - Professional Associations (e.g., NACUBO, Society of Accountants)
  - Other types of consultants
- How should output of providers of assistance be monitored and by whom?
- Should we use prior performance of institutions in improving their management systems in future funding decisions?

o What is the current role of assisting agencies in preparing Title III applications and monitoring their implementation? Is this role appropriate? OA.

o Based on these recommendations, what should be the purpose and structure of the proposed conference with Title III assisting agencies?

In addition to the above, Dr. Berry asked that the letter to institutions regarding the Title III MITS site visits be rewritten. The current draft implies that we will provide the technical assistance to solve management problems. It should be revised to indicate that we will assist grantees in identifying problem areas and means to correct deficiencies. The revised draft is to be cleared by Pickman and Ellis.

Basil
Basil Henderson

cc: Mary Berry
John Ellis
Jim Pickman
Mike Smith

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AUDIT SCHEDULE

Assisting Agencies

The Audit Agency is examining the consortium TACTICS. Preliminary work began in August; GPMD's latest request for an audit came on July 12. Representatives of five of the six TACTICS components have been interviewed; the final interview is scheduled for November 7. In addition to audits of the six components, the examination of TACTICS will include audits of the six coordinating colleges (Knoxville College, Lane College, Livingston College, Oakwood College, Paris College, Stillman College) and interviews at 12-18 selected participating colleges. A report on the TACTICS organization should be finished by September 30.

When the TACTICS audit is finished, audits of the ACCTION consortium and McManus Associates are scheduled to begin.

Title III Institutions

Four audits of institutions are in progress, involving Shaw (N.C.), Daniel Payne, Grambling and Bishop.

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SITE VISITS - COMPLETED

INSTITUTION

1. Northland College (Wi.)
2. Alaska Pacific U. (Ak.)
3. Fayetteville State U.
4. Grambling U.
5. Kansas Wesleyan
6. Langston U.
7. Texas C.
8. Wiley C.
9. Barber Scotia C.
10. Alliance C.
11. Xavier U.
12. Bloomfield C.

SITE VISITS - SCHEDULED

INSTITUTION /DATE

1. Compton CC (11/18)
2. Edward Waters C. (11/18)
3. Mary Holmes (11/26)
4. Tougaloo (11/26)
5. Steubenville (11/26)
6. St. Augustine's (11/26)
7. Lakeland C. (11/26)
8. Mount Senario C. (11/26)
9. Voorhees (12/3)
10. Lincoln U. (Mo.) (12/3)
11. Oakwood C. (12/3)
12. J. Sergeant Reynolds (12/10)
13. Central State U. (12/10)
14. Wilberforce U. (12/10)
15. Thomas More (12/10)
16. Morristown C. (12/10)
17. Husson C. (12/10)
18. Nasson C. (12/10)

SITE VISITS - TO BE RESCHEDULED WITH GPMD

INSTITUTION

1. Fisk University
2. Christian Brothers College
3. Highland Park CC
4. State CC - East St. Louis
5. Barat C.

SITE VISITS TO BE RESCHEDULED (DID)

1. J. C. Calhoun
2. Alexander City State

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The Division of Institutional Development plans to complete site visits to the following institutions between January 1, 1980 and June 30, 1980.

NORTHERN TIER

1. Aurara College (IL)
2. Chicago State University (IL.)
3. St. Francis College (IL.
4. Vincennes University (IN.)
5. Bowie State College (MD.)
6. Eastern Nazarene College (MA.)
7. Emerson College (MA)
8. Sienna Heights College (MI)
9. Washtenaw Community College (MI)
10. College of St. Benedict (MN)
11. Flathead Community College (MT)
12. Miles Community College (MT)
13. Camden County College (NJ)
14. Mercer County Community College (NJ)
15. Boricua College (NY)
16. Medgar Evers College (NY)
17. Chatfield College (OH)
18. Cuyahoga Community College (OH)
19. College of Misericordia (PA)
20. Lincoln University (PA)
21. Lyndon State College (VT)
22. Wenatchee Valley College (WA)
23. Viterbo College (WI)

MIDDLE TIER

1. Oxnard College (CA)
2. San Diego Community College (CA)
3. Fort Lewis College (CO).
4. Regis College (CO)
5. University of Southern Colorado (CO)
6. Sterling College (KS)
7. Tabor College (KS)
8. Kentucky Wesleyan (KY)
9. Pikeville College (KY)
10. Maryville College (MO)
11. Penn Valley Community College (MO)
12. College of St. Mary (NB)
13. Doane College (NB)
14 Bennett College (NC)
15. Elon College (NC)
16. Greensboro College (NC)
17 Vance Granville (NC)
18. Freed-Hardeman College (TN)
19. University of Tennessee at Martin (TN)
20. Virginia State College (VA)
21. Virginia Union University (VA)
22. Bluefield State College (WV)
23. Wheeling College (WV)

SOUTHERN TIER

1. Livingston College (AL)
2. Spring Hill College (AL)
3. Central Arizona (AZ)
4. College of Ganado (AZ)
5. Arkansas College (AK)
6. Shorter College (AK)
7. Biscayne College (FL)
8. Brevard Junior College (FL)
9. Clark College (GA)
10. Gainesville Junior College (GA)
11. Delgado University (LA)
12. Dillard University (LA)
13. St. Mary's Dominican College (LA)
14. University of Southwestern Louisiana (LA)
15. Coahoma Junior College (MS)
16. Meridan Junior College (MS)
17. Northwest Mississippi Junior College
18. Wood Junior College (MS)
19. St. Gregory College (OK)
20. Seminole Junior College (OK)
21. Lander College (SC)
22. Midlands Technical Institute (SC)
23. Austin Community College (TX)
24. Bee County Junior College (TX)

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE ASSISTANT SECRETARY FOR EDUCATION
WASHINGTON, D.C. 20202

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NOV 21

Senator Max Baucus
United States Senate
Washington, D.C. 20510

Dear Senator Baucus:

In your letter of November 5, 1979 you asked that I supply to the Subcommittee on Limitations of Contracted and Delegated Authority the following information:

1. The names of all Office of Education personnel who, between January 1, 1973 and the present, inclusive, have left the agency to work as consultants, part-time or full-time employees of any of the following "assisting agencies": TACTICS, Phelps-Stokes Fund, Moton Memorial Institute, Institute for Services to Education, United Board for College Development, University Associates, Inc., ACCTion, or the Council for the Advancement of Small Colleges.

2. The names of all Office of Education personnel who, between January 1, 1973 and the present, inclusive, have left any of those previously-mentioned "assisting agencies" to work as consultants, part-time or full-time employees of the Office of Education.

In response to this request, I have enclosed a list of the employees who to our knowledge have left the Office of Education to work at one of the cited organizations and a list of employees who have come to OE from these organizations. These lists were compiled by querying present and former OE officials.

An exhaustive search of OE files to identify additional names that might fall into these categories would require considerable time and effort. This is because records older than 3 years are stored in the Federal Personnel

Archives in St. Louis, Missouri. Moreover, there is no certainty that many new names would be added to the lists enclosed. For instance, the records kept on employees who leave OE contain only very limited information as to the reasons for their departure and their planned destination. Records regarding previous employers are more complete. We would be pleased, however, to allow your staff full access to any of these records, or to aid them in procuring records they wish to inspect from the St. Louis storage facility.

Mary Berry

Mary F. Berry
Assistant Secretary
for Education

Enclosures

FORMER OE EMPLOYEES NOW EMPLOYED BY ASSISTING AGENCIES OR LOBBYING GROUPS

1. John Phillips - NAICU (Lobbying Group)
2. Tom Englund - CASC
3. Willa B. Player - University Associates (Board of Directors)
4. John Orcutt - Association of Junior and Community Colleges
5. David Mathews - University Associates (Board of Directors)
6. Bert Lampkins - Institute for Services to Education

FORMER ASSISTING AGENCY EMPLOYEES NOW WORKING AT OE

1. Dr. Edward Brantley (Director, Title III)
   Institute For Services to Education

2. Dr. Robert Albright (Office of the Deputy Commissioner)
   Robert R. Moton Institute

3. Mr. Karl Helms (Title III Staff)
   Institute For Services To Education

4. Ms. Paula Potts (Title III Staff)
   Robert R. Moton Institute

ADDITIONAL PREPARED STATEMENTS

Prepared Statement of Van S. Allen

Statement
of the
Technical Assistance Consortium to Improve College Services

on

Developing Institutions Program
(Title III)
of the
Higher Education Act
for the
Subcommittee on Limitations of Contracted and Delegated Authority

Presented by
Van S. Allen, Executive Director
Technical Assistance Consortium to Improve College Services
November 14, 1979

Some Responses to the Washington Star and Washington Post Articles on the Title III Program and Several of Its Affiliates

by Van S. Allen*

It is almost impossible to respond to the series of articles appearing in The Washington Star and The Washington Post for October 18, 20, and 21, 1979, without questioning first the motive of those who initiated this publicity. The GAO Report, on which some of the misrepresentations mentioned in the articles are based, has been available since December 1978, and a matter of public record since January 1979. Why were the articles published now and presented as completely new information, why not earlier?

In one of their major distortions of fact, the articles lead readers to believe that the program and its problems only relate to Black Americans and the historically Black colleges and universities, and Assisting Agencies which are also historically Black, except in one instance. The facts are that at the height of the participation of historically Black colleges and universities in the TACTICS program, there were only 105 involved, while the total count of "developing institutions" having participated in the Title III program has ranged as high as 800 plus at given times.

This respondent would be the last to say that the program is without problems, but would be the first to say that the good of the program far outweighs its faults, and hence, it should be looked at from the point of view of its good works first, and then its weaknesses.

The writer recognizes the nature of our news media, which requires a more or less steady diet of sensationalism, but questions the amount of destruction that such treatments of information wrought upon the parties and/or organizations under attack as well as the unknowing public.

By way of an example, the October 18 Washington Star article, by Kurtz, observes that the GAO Report notes that over 14 years the program had spent some $940 million on some 800 institutions, and that no federal official had been able to identify any concrete progress among the 800 schools who received aid during this period.

When this kind of statement is made to the general public, all the public is likely to remember is the amount spent (in taxpayer dollars) and the statement to the effect that no federal officials were able to identify concrete progress among the 800 schools, a clear indication of a waste of tax dollars.

What the general reading public is unlikely to know or figure out is that when the $940 million is divided by 14 years, we are talking about an average of $67,142,851 per year. And, when this figure is divided by 800 schools the average is about $83,900.00 per institution, which is minimal support when one considers the fact that even the smallest and poorest of the historically Black colleges have budgets that range from three and one-half to five million dollars per year.

The matter of institutions not having made any concrete progress ignores completely the hundreds of documents that have been submitted by the hundreds of Title III colleges and universities, and the historically Black colleges and universities in particular, over these 14 years, setting forth the achievements they have been able to attain with the support of the Title III program.

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*Van S. Allen, Executive Director, TACTICS

The issue that has continued to be at the center of the confusion regarding what the program is supposed to do is related to the expression "developing institutions" and the unarticulated expectation that anything that is "developing" will, at some point in time, become "developed."

The problem here is related to the fact that education is, by its very nature, a continuous process, and as such, the concept of "developed" is antithetical to what education and its processes are about. The process never ends. It is continuous, always moving from a lower degree of refinement to a higher one.

The institutors of this concept of "developing institutions" failed to recognize the fact that the "developed institutions" that served as the model for the deficit definition of "developing," also were continuing to develop. The supposition was that the "developing institutions," upon achieving certain characteristics of the "developed institutions," would then become "developed institutions" themselves.

The end product of the failure to take this continuous-development nature of education into consideration, for both the "developing" and the "developed" institutions was a rude awakening on the parts of those who expected these institutions to achieve "developed" status. While these institutions had made progress and achieved certain developments in keeping with their plans and expectations, their counterpart models (the developed institutions) had evolved some distance ahead during this same period of time, and thus the gap between the two types of institutions is about as wide as it ever was.

It is a small wonder, therefore, that there are so many questions and so much frustration around the concept of developing institutions. And, when one adds to the historically Black colleges and universities, three hundred and fifty years of the experience of physical and mental oppression and a hundred years of economic and mental oppression, the differential in developmental needs becomes even more obvious.

Hindsight suggests that it would have been far better to have focused the emphasis on providing help to institutions serving large numbers of minority group students, with the focus on "developing the potential of human beings" rather than "developing institutions." For clearly in the case of the historically Black colleges and universities, their capabilities for educating disadvantaged students has been proven over the years. Their need in the past and now, continues to be resources to get the job done, resources that have been denied them by the self-same system that necessitated the establishment of such institutions in the first place.

The comment quoted from the GAO Report to the effect that the program is..."largely unworkable" would have been more accurate if the programmatic aspect had been separated from the fiscal management problems that are the focus of the GAO Report.

It is difficult for the writer to comprehend how a program that has meant so much to the historically Black colleges and universities could be construed as having been a failure in the face of such evidence as revised and changed curriculum offerings, and larger enrollments in such areas as business administration, computer sciences, research, etc., all non-traditional academic areas for Blacks. Other areas of improvement as a direct outgrowth from the Title III program are seen in steady and gradually increasing enrollments in these institutions in spite of the increased competition for minority students by more affluent and otherwise more advantaged historically white institutions; the establishment of uniform data systems; better systems of accountability, both fiscal and programmatic; and improved proposal development capabilities as reflected in the increased numbers of proposals coming out of these institutions that are funded by both federal and foundation sources.

With the support of the Title III program, the majority of these institutions have been able to develop both long-range and short-range plans that are relevantto their institutional philosophy and goals and objectives. These plans are presently in varying stages of completion, as is evidenced by actual achievements which are recorded in institutional reports and external evaluations made by these programs during the last four years. (These reports can be found in GPMD, Title III's program management personnel's offices, as well as on the campuses of the colleges and universities).

The Kurtz article (Washington Star, October 18, 1979) refers to TACTICS as being a group of "six Washington consulting firms" when, in fact, TACTICS is an entity which was created at the request of the presidents and chancellors of the historically Black colleges and universities in 1971, for the purpose of providing needed technical assistance to their institutions. The agencies referred to as being a part of the TACTICS consortium, are in reality, Assisting Agencies to the TACTICS program. Because of their proven track records in working with historically Black colleges and universities in specific areas, i.e., curriculum, academic management, information systems, development and management, fiscal accountability, etc., these agencies have been given the responsibility of providing backup support for the several TACTICS components that plan, develop, and deliver requested programs and services to the constituent institutions. This means, among other things, that each Assisting Agency's resources in terms of both materials and personnel are at the disposal of the TACTICS program personnel. Otherwise, these agencies are separate entities from TACTICS, having a number of involvements in the forms of bilateral and consortial arrangements that are between the agencies and the colleges themselves. TACTICS is only one of these agencies' involvements. They had been in the technical assistance business for many years before the creation of the TACTICS umbrella concept and exist as separate agencies outside it.

Regarding the quoted OE official's comments to the effect that TACTICS ends up with as much as a quarter of the program's aid to Black colleges, the facts are that TACTICS, to provide technical assistance to an average of 85 colleges and universities, was funded during its first four years of operation at two million dollars a year. During the last four years, the funding has ranged from 1.8 million down to 1.6 million to serve a similar number of institutions. $1.6 million is nowhere near a quarter of the $10 million that is allocated to Title III.

This information on funding for TACTICS is available in GPMD's files, as well as those of OE's program management and at the Coordinating Colleges for the TACTICS program.

It appears that much of the confusion regarding the above matter has been caused by the failure of the investigators to separate out funds that were received by Coordinating Colleges for support of the TACTICS program operation and those funds received by colleges who elected the same Assisting Agencies to relate to their bilaterally structured or individual, non-TACTICS relationships. In the latter instances, the Assisting Agencies received from a low of 5% to a high of 20% of the total budgets cited in the OE Awards Document. The remaining 80 to 95% remained with the colleges. It also should be kept inmind that TACTICS, when it received the two million dollars a year, was receiving only 4.2% of the 48 million dollars allocated to historically Black colleges and universities...the two million dollars has been reduced to 1.6 million dollars over the past four years.

This is a far cry from the claim that one-quarter of program aid to Black colleges goes to TACTICS.

The comment about the exercise of undue influence over the colleges participating in Title III ignores at least two important points, namely 1) where TACTICS is concerned, institutions have to request the services desired at least one year ahead of the time delivery is expected (Such requests are carried in the upcoming proposals for the TACTICS program), and 2) there were no experienced agencies on the scene who had a track record of having worked successfully with historically Black colleges except for the ones chosen by the TACTICS program to assist in this technical assistance effort.

Since the inception of TACTICS, a number of agencies claiming to have expertise to work with the Historically Black Colleges and Universities has arisen...and many of these have already gone out of business, because they, in fact,did not have the experienced personnel, and hence, the expertise to respond effectively to the needs of these institutions.

They evolved as consulting agencies as a rule, and they followed the philosophical premise that resulted in their delivering a service or program via a consultant relationship and, once the delivery process was over, the relationship between that consulting agency (also known as Assisting Agency) and the institution ended.

TACTICS, on the other hand, has tended to provide technical assistance that has had built-in followup, follow-through experiences which have assured the continuity of efforts over time and the opportunity for the development of accumulative records of program achievements growing out of joint efforts of TACTICS and the participating institutions.

TACTICS, being an instrument of the colleges, is continually on call to these institutions. If an effort put into the field does not work, TACTICS personnel are expected to determine why and rectify the situation.

Given the choice between the latter form of service and that offered by the forementioned Assisting Agencies, the tendency for Historically Black Colleges and Universities to select TACTICS' services is understandable. And, this tendency explains the appearance that the TACTICS organization has a dominant position with these institutions. The question that this allegation raises is, what other choices are there for these institutions if they are to have competent and experienced program and service responses to their needs?

Reference to the Robert R. Moton Institute as a TACTICS firm (see Washington Star article dated October 18, 1979) to which St. Paul's College paid $300,000 a year is another misleading piece of information. Moton Institute is not a TACTICS firm. It is an independent agency that is one of the Assisting Agencies to TACTICS. The Independent Study Center is designed to benefit Black higher education in general, and the complexity of the effort requires the full attention of an administrative mechanism such as Moton. The point of contention appears to relate to St. Paul's not having anyone in the program and the fact that the Moton Institute was the recipient of all of the funds except for $9,000 which represented the College's cost for taking care of the fiscal accountability function for this program.

What is missed altogether in this issue is the fact that Assisting Agency relationships were arrived at in the first place because the Historically Black Colleges and Universities did not have within their operations the extra personnel or financial resources to mount and carry out programs and services needed by large numbers of institutions. Yet, these institutions, like their more advantaged white counterparts, had needs that required such services as those offered by the Center for Independent Studies. Thus, Moton was chosen as Assisting Agency and St. Paul's was chosen to coordinate the effort. The St. Paul/Moton arrangement represents an adjustment made in keeping with the available resources, and guidelines governing those resources, to meet the needs of a large group of institutions, not just St. Paul's College.

In recent years, the Office of Education has given a great deal of attention to efforts to promote objectivity in the determination of Title III grant recipients. And, while objectivity has much to recommend it, the writer is not sure that objectivity that brings to the proposal screening process persons who have little or no knowledge of Historically Black Colleges and Universities, or their achievements made possible by the Title III programs, can respond in the best interest of these institutions.

There appears to have been a continuous effort to push the decision-making process regarding grants to institutions into a purely competitive context, which tends to ignore the continuous nature of the educative processes, and more specifically, the continuing needs of the majority of students being served by these institutions. To make grants that respond to these institutions on a purely competitive basis is to increase the risk of denying institutions the resources they need to carry out the important task of educating. Proposal screeners who are not familiar with these colleges in terms of their histories and struggles and their strengths and weaknesses are unlikely to be able to make the best decision regarding their qualification.

Without some subjective treatment of proposals the more advantaged institutions would automatically end up with the lion's share of any funding done on a purely competitive basis. And in the case of the Historically Black Colleges and Universities, thousands of poor students would be deprived of a better educational opportunity.

Given these considerations, who are the persons who are likely to make the best decisions for these institutions?

In this case, the writer would opt for persons who have an intimate knowledge of the institutions concerned over and against any effort to approach this process in a purely objective context, such as having persons screen proposals who know little or nothing about the institutions making them. There is too much at stake to run this type of risk. In other words, the best interest ofthese institutions is more likely to be served through more subjective considerations than objective considerations. It should be borne in mind that these institutions are not engaging in an experiment, but a proven process of educating disadvantaged students, and as such, they do not need to be treated as if they are engaging in an experiment.

In the newspaper articles, reference was made to the overlapping office arrangements of certain TACTICS elements. What was not dealt with in the articles was the fact that such arrangements make possible lower costs for space, telephone, lights, and related utilities. They also make possible the sharing of such services as duplicating, office supply purchases, etc., all of which significantly reduce overall administrative and operational costs.

The writer is quoted as observing that "anytime anything of significance starts flowing into the Black community, someone raises objections. Our records are as good as in historically white colleges. They are hassling about a small amount of money."

Speaking further to this position, it will be recalled that better than one year ago HEW's Secretary Califano announced an investigation of historically Black colleges having significant default percentages where their student loan (NDSL) collections were concerned.

This information was presented to the press initially in such a manner that readers got the impression that only historically Black colleges and universities were having such experiences, when in fact, there was a total of 200 institutions that had default rates of 50% or more on NDSL's, of which 43 were historically Black. The protesting of this biased introduction of this subject by our presidents and chancellors resulted in this problem for both historically Black and white colleges and universities being highlighted and the realization that wherever large numbers of poor students were being served, a high default rate could also be expected, whether the institutions were predominantly Black or white.

Prepared Statement of Niles A. White

TESTIMONY

Before the

SENATE JUDICIARY COMMITTEE
Subcommittee on Limitation on Contracted
and Delegated Authority

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1420 K Street, N. W.
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20 Novemeber 1979

My name is Niles C. White. I am the Director of Government Affairs for the United Negro College Fund., Inc. I am grateful for the opportunity to provide this written testimony to the Senate Subcommittee on Limitation on Contracted and Delegated Authority.

There have been recent newspaper articles critical of Title III of the Higher Education Act of 1965. These articles take out of context a General Accounting Office report on the administration of the Title III program. These articles allude fiscal mismanagement on the part of a few participating institutions along with some assisting agencies.

The Fund understands the need for periodic review of all Federal programs and supports appropriate measures to correct programs which are not being administered properly. However, the current publicity concerning Title III appears to be off-tract, overblown, and specifically designed to benefit a segment of the education community which over the years has a negligible or negative service to the low income and disadvantaged student. The pride which these institutions take in their being able to provide a wide curriculum to their students and research laboratories for their faculties is legendary. These institutions "sought the best" and "got the best" because "they had the most." However, due to the current financial squeeze, which we all find ourselves, they wish now to humble as a "developing institution."

The purpose of Title III of the Higher Education Act of 1965 is to assist in raising the academic quality of colleges which have the desire and potential to make a substantial contribution to the higher education resources of our Nation but which, for financial and other reasons, are struggling for survival and are isolated from the main currents of academic life.

Title III provides for the strengthening of developing institutions through Federal funding of programs. These programs are aimed at the improvement of an institution's faculty, curriculum, administration, and student services. Although each "developing" institution is distinctive, there are some common characteristics:

- o These institutions are small, poor, and serve the low income and disadvantaged student;
- o These institutions have a very low tuition scale;
- o These institutions are not able to obtain "attractive" Federal grants because of their limited faculty staff.

However, despite these adverse "common characteristics," Black institutions have been able to impact significantly on Black higher education access. It should be noted that the Black institution was established to serve Black students when they were prohibited by law or custom from attending the predominately white institutions. The historically Black institutions have proven to be a vital national resource. It provides over 70 per centum of America's Black graduates, 75 per centum of Black

Americans with Ph.D.'s, 80 per centum of Black Federal judges, and 85 per centum of Black physicians. These institutions, which total less than five per centum of the Nation's higher education community, award almost half of the undergraduate degrees earned by Blacks. The historically Black colleges do not merely provide an educational opportunity for low income and minority students. They are better able to fund, matriculate, and graduate minority and low income students than are most predominately white colleges and universities.[1] They are a national resource since they contribute so heavily to the achievement of national educational policy. From a policy perspective, programs for the support of the historically Black college might better be based on this function which they perform so well.[2]

The United Negro College Fund, Inc., institutions that are participating in Title III have been able to strengthen and expand curriculum development. These institutions have been able to provide more student services in the area of counseling and testing. These programs have become instrumental in the maintenance of a number of programs that are vital to their total development.

The Title III Program at Huston-Tillotson College can be viewed as a program committed to serving the needs of students by integrating this component into the overall academic life of the institution. The Title III support has effectively moved the College along a continuum of improvement both administratively and academically. Some of the College's objectives have come closer to realization due to involvement in the Title III Program.

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[1] Gruson, Edward S.; Developing Institutions, Background and Policy Alternatives: Sloan Commission on Government and Higher Education December 1978, p.2.
[2] Ibid

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Federal funds have aided in establishing an Institutional Research Office, Placement Office, a Cooperative Education Program, a Recruitment Program, and Title III Coordinator's Office. Additionally, through this support, the College was able to upgrade its Business Administration Department with a major in Accounting and Hotel/Restaurant Management.

With the aid of Title III support the Institution was able to successfully complete the Institutional Self-Study.

A number of objectives of Huston-Tillotson College have reached a varied level of realization due to the College's involvement in Title III Programs.

a. Curriculum Development - The Basic Studies Program has served as a catalyst for a number of curricular changes. Title III funds have enabled the College to strengthen its freshman courses through (a) development of materials related to students' needs and interests, (b) retraining of freshman faculty in use of different teaching-learning strategies, (c) development of pre and post criterion reference test, (d) implementing co-curricular activities which reinforce classroom experiences, (e) Coordinating Learning Skills Center services with regular classroom assignments, (f) examining ideas, experiences, and materials with other institutions with similar missions. Cooperative Education provided real life experiences along with opportunities for students to earn funds as they prepare for future life-long employment. The Institution has initiated majors in two non-traditional areas, namely, Accounting and Hotel/Restaurant Management.

b. Faculty Improvement - Nine members of the faculty have pursued the doctorate degree with aid of Title III funds. Five of these individuals have received the terminal degree and returned to the College subsequent to 1969. Faculty travel to conferences and workshops has also been provided by Title III funds.

c. Administrative Improvement - This component has been strengthened through support from Title III funds. It has provided administrative services as well as funds to train and upgrade personnel. More administrators have been able to attend conferences, workshops, and professional meetings over and above that which the institution could normally provide. Two Masters have been earned with the assistance of Title III funds.

d. Student Services - Title III funds were used to establish an Admissions/Recruitment Office and to improve and expand its services for students. Student Recruitment has assisted the College in sustaining its current enrollment. Opportunities have been provided for staff development that could lead to creative endeavors in recruiting and maintaining students. The Human Development Center, an expansion of student services was established in 1978-79. This component has strengthened this area by offering counseling and guidance services to the total campus. Test-Taking and Learning Skills have improved the test-taking skills.

a. __Business Management Improvement Program__ of which Huston-Tillotson College was the coordinating institution, assisted institutions in improving management of institutional resources. This program provided middle management personnel with additional training in order to improve management capabilities.

Through its involvement in Title III, the College was able to strengthen its Office of College Relations which incorporates an Office of Alumni Affairs. Unrelenting efforts of this office have generated increased alumni support in various ways--recruitment of students, increased financial support from alumni, identification of other potential donors, and cultivation of church, business and industrial constituencies. Through these programs the institution continues to anticipate strong programmatic activities focusing on expansion of student services and positive image building which the College richly deserves.

The College feels that Title III involvement has further provided assistance in strengthening its position as an integral part of the system of higher education via cooperative arrangements with the University of Texas at Austin, Austin, Texas; St. Edward's

University, Austin, Texas; Southwestern University, Georgetown, Texas; and as a by-product, cooperative programs with Southwest Texas State University, San Marcos, Texas.

Title III has benefitted Livingstone College by providing funds for various kinds of new and innovative programs.

The Business and Fiscal Management Component, funded for the first time in 1978-79, improved the accounting procedures and records management capability of the College. A Federal Programs Accountant was hired to develop and maintain a system of accounting for all Federal funds.

The Title III Grant enabled the Business Department to conduct a number of important activities. Two faculty members in Business Administration were supported by the grant. New equipment was purchased for the typing and machines laboratories. The department continued to participate in the BEEP Program (Black Executive Exchange Program). The following companies and agencies sent representatives in 1978-79: The Bendix Corporation, Delco Moraine Division of General Motors Corporation, U.S. Department of HUD, Hoffman-LaRoche, Western Electric, Atlantic Richfield, General Motors Corporation, and Addressograph Multigraph Corporation. Additionally, faculty members were supported in attendance at professional meetings and students were taken on educational trips to business corporations.

Comprehensive Basic Studies, designed to improve the basic skills of students and prepare them for success in college pursuits, included components in reading, writing, mathematics, biology, social institutions, physical science, counseling and the learning center. During the 1978-79 school year modules were developed in reading, and four sections of reading were offered (137 students). A writing laboratory was instituted as a means of improving auditory and verbal communication of students. During the summer of 1979, 10 faculty members participated in the ISE Summer Conference for curriculum and faculty development. The total diagnostic/prescriptive approach involving mathematics, English, reading, social institutions, biology and physical science was used. The basic activities in this approach included: pre-testing, structuring of modules to address deficiencies, post-testing, use of common course syllabus, counseling, and learning center support. The Math faculty members published a manual, "Daily Use of Mathematics," Anderson, Huffstetler, Nelson: Copyright, September 1978. Other program highlights for 1978-79 were as follows:

> In English, statistical data gathered indicated some validity as to the Education Skills stanines and the ability of students to achieve the first semester.
>
> In Social Institutions, the pre-test identified with specificity the weaknesses of students in handling

maps, graphs, charts, etc. Modules were designed to strengthen students in these areas.

In Biology, a common syllabus and common examination in preparation for the initiation of the intervention model were effected.

In Physical Science, the reduced class size and new emphasis on laboratory experience caused several students to consider science as a major.

In Mathematics, a developmental Mathematics course was instituted for students with stanines of 2 or below.

The Learning Center provided a very valuable service to the campus. A part-time mentor was employed to assist the Director.

Counseling continued to be an integral part of the program with responsibility for the immense statistical work of the program.

The activities in the Cooperative Physics Program for 1978-79 centered around implementation of the dual degree engineering program. Several students were recruited and three (3) students applied for the Howard University Cooperative Physics Summer Program. The Director participated in the Howard University

Cooperative Physics Conference and the Cooperative Physics Conference held in Miami, Florida.

The Counseling and Testing Staff continued to provide individual counseling on an on-going basis. Special programs for 1978-79 included coordination of student attendance at a pre-law workshop at North Carolina Central University, Test Taking and Learning Skills Conference for faculty, student attendance at the pre-MBA/MED workshop at Appalchian State University and continuation of the peer counselor tutoring program. Center staff also implemented an improved study skills and orientation course and worked with faculty to develop student analytical reasoning skills via the medium of a public speaking club. Campus workshops dealt with transactional analysis, environmental protection, and psychiatry.

The Cultural Enrichment Program brought a number of outstanding performing artists and lecturers to the campus. The 1978-79 scheduled appearances were as follows:

Lecturers

- Richard Goldsby, Genetic Researcher
- Ed Bradley, CBS News Correspondent
- Benjamin Mays, Renowned Educator and Author
- John Lewis, Director of ACTION
- Carole Simpson, NBC News Correspondent
- Walter Fauntroy, U.S. Congressman
- Loretta Long, Star of Sesame Street

Performing Artists

- Latimer/Lytle Jazz Ensemble
- Edith Stephens Dance Company

Student organizations hosted all artists, lecturers, and scholars, and a series of Living-Learning sessions, luncheons, classroom visits, and workshops were held.

The Faculty Development Program continued to provide support . for study and development and enrichment. During the 1978-79 school year, 18 faculty members participated in a variety of workshops, institutes and seminars. As a result of some of these travel experiences, proposals have been generated to NEH and DISE. Also, new insights were gained on computer-assisted instruction, pre-law and pre-med requirements and communication laboratories. Three all-campus retreats were held, pre-school, mid-year, and post-school. National Teaching Fellows in Music and English were supported.

The major Title III emphasis in the Financial Aid Program was on improving the organization and administration of the College Work Study Program. A monthly log was kept on the time and earnings. Students were counseled on the purpose of the program and the requirements and expectations. The staff members were kept abreast of changes in the Financial Aid Program by participation in workshops sponsored by the Office of Education and Moton Consortium on Admissions and Financial Aid.

The Institutional Research Office continued to maintain centralized statistical information concerning the college, and make the necessary reports to internal and external sources. The institutional fact book for 1976-77 and 1977-78 was completed, a data element dictionary was completed and faculty, staff, and student profiles were completed. Staff members attended workshops and seminars to upgrade their skills. Additionally, a total of 50 surveys and reports were completed and five literature reviews conducted. The Institute for Services to Education provided assistance for the program.

The International Curriculum Development Program had a significant impact on the campus, as well as the community. The ICDP staff and committee participated in the International Day Activities and coordinated the visit of foreign curriculum consultant, Dr. Abeodu B. Jones of Liberia. Other activities included presentations in the local schools by faculty members who visited West Africa as a part of the Ethnic Heritage Seminar sponsored each year by the Phelps Stokes Fund. The persons who made presentations off-campus were Mrs. Eliza Miller, Ms. Louise Rountree, and Mrs. Wilhelmenia Boyd. Mrs. Victoria Yates, the 1978 Ethnic Heritage Seminar participant, made a presentation on-campus which highlighted her experiences in West Africa. Livingstone was represented at the Phelps Stokes Annual Conference by Ms. Louise Rountree, Dr. Willa Bryant, and Mrs. Victoria Yates. Ms. Rountree served as moderator for one session; and Mrs. Yates was a group leader.

The Living-Learning Centers provided for educational programs and other special interest activities in the residence halls. In addition to regularly scheduled study hours, campus organizations, classes and institutional committees used the centers for testing, tutoring, and peer counseling workshops. Group facilitators included: Mrs. Dorothy Johnson, Community Leader and poetess; Ms. Joyce Piggie, Media Specialist;. Mrs. Fannie Kelsey, Reading Professor; Dr. John Carter, Psychiatrist; Dr. F. George Shipman, President, Livingstone College; Dr. Joseph C. Settle, Director of Student Affairs; Mr. Ernest Davis, Physical Plant Director; Ms. Louise Rountree, Head Librarian; Mrs. Esther McNeil, Director, Career Counseling and Placement; Dr. Paul Smith, Vice President of Morehouse College; Mrs. Elaine Brown, Social Worker; Mr. Vergel Lattimore, Counselor, and Mr. Rosey Grier.

The Long Range Planning Program involved all aspects of the institution. The areas of significant progress and concern were institutional mission, institutional and unit goals, enrollment, budgeting, program review and resource. During the 1978-79 academic year, initial drafts of academic unit plans were completed. A budgeting process and evaluation criteria were developed in each area of the institution. The Planning Committee reviewed academic area plans and evaluated the overall process. Staff members participated in the TACTICS Management Development workshops this year and Ms. Mary Price conducted a communications workshop during the mid-year retreat.

The planning grant in Music Therapy was used to help orient students and faculty to the proposed program. A pilot course in Music Therapy was introduced during the second semester in which 10 students enrolled. Visits to the Veterans Hospital and Duncan School were made. The Music Therapy Curriculum was reviewed by the Curriculum Committee. Dr. Richard Graham of the University of Georgia at Athens, conducted a student workshop. A film festival was held to provide an opportunity for students to observe the nature and population being served in clinical settings.

The Teacher Education Program conducted a number of activities. Special awareness, self-concept, and values clarification / seminars were held. Students visited inner city schools and neighborhoods. Seminars were held to help students develop appreciation of cultural and ethnic differences, and films on different cultures were shown. College Education faculty and public school personnel continued to work to improve the teacher education for cooperating teachers and college supervisors of student teachers held April 19, 1979. The Education faculty members developed a course for freshmen, the purpose of which was to provide for early consideration of skills and abilities required in the teaching profession. Consultants for 1978-79 included Dr. James Abbott, Director of CUTE in Kansas; Dr. Robert Colver, Duke University; Dr. Robert Shepard, Vice President, ISE; Ms. Celia Wiedenhoft, Director, Early Childhood Program, Spencer, Wisconsin; and Dr. Marian Vick, Chairman, Department of Elementary Education and Director of Graduate Reading Program, A and T State University. Publications: Awareness and Readiness for Teaching Part I and Part II.

Activities of the Title III Coordination effort centered around monitoring programs from a fiscal and programmatic standpoint and coordinating the internal and external evaluation of programs. Additionally, the Coordinator was responsible for circulating four issues of the Update on Title III Activities, revising the policy manual and coordinating the preparation of the 1979-81 proposal.

The Trustee Training Program continued to provide training opportunities for Trustees of the College. During the current school year, Trustees participated in meetings of the Association of Governing Boards; the North Carolina Association of Independent Colleges and Universities; NAFEO (the National Association for Equal Opportunity In Higher Education), the National Conference on Trusteeship, and the National Alumni Association. Consultants for Board workshops were Mrs. Barbara Phillips, National President of Alpha Kappa Alpha Sorority; Mr. George S. Paul, Vice President of Southern Railway Company, and Mr. Earl Raveneau of Moton Memorial Institute. The program stimulated the Trustees to study literature from the Association of Governing Boards, and to take a more active role in understanding the problems in higher education, particularly those related to long range planning at Livingstone College.

The Word Processing Center provided centralized clerical service to the campus. During the 1978-79 academic year, the center served approximately 50 faculty, staff and administrators. A procedures manual for users was circulated to various campus personnel. Additional equipment was purchased and workshop sessions were held to help orient users to equipment. A seminar was also sponsored for supervisory training. The Director worked with the Business Department and the Financial Aid Office in establishing an internship program for six students. Staff members attended the Word Processing workshop at Winston-Salem, North Carolina and five (5) secretaries attended the Educational Secretaries Seminar held at Appalachian State University in Boone, North Carolina.

Livingstone continued to participate in the Student Services Institute Program. Staff members from the College participated in inter-institutional professional development workshops and received service from on-campus consultants.

Barber-Scotia College has participated in the Title III program since the 1969 fiscal year. Grant awards since that time have totaled $1,509,122. As a result of these funds, the institution has strengthened academic programs, student services, and improved overall administration of the College. The programs in which Barber-Scotia College has participated show a distinct relationship between the impact of Title III programs and the present ability of the College to provide quality education.

For over a century, Barber-Scotia College has contributed to the growth and development of young people, and has therefore sought to offer the best possible education to students. The pursuit of this goal has necessitated a continual assessment of programs and services in order to remain relevant to the times and prepare graduates to meet the challenges of living in the working society. With a large proportion of support coming from the United Presbyterian Church, U.S.A. in earlier years, and support from the Church decreasing in recent years, the College has been placed in the position to seek alternative means of support to carry out its mission. The role of Title III since 1969 has been extremely important in that this program hasprovided a much needed resource for institutional development. The College has been able to strengthen existing programs and begin new and innovative programs that respond to the needs of students today.

Beginning with the Six Institutions Consortium in 1968, Barber-Scotia College joined five other institutions of similar purpose, in an effort to foster inter-institutional cooperation for the purpose of pooling resources and strengthening member institutions in the direction of achieving the overall quality improvement of undergraduate education. This cooperation was directed at the sharing of administrative know-how; faculty-staff personnel and Institutional development; African, Afro-American Studies and cultural enrichment; and the improvement of curriculum, counseling services, and developmental education.

The focus during fiscal year 1969 was on curriculum reform and cultural enrichment in the social sciences and literature. In 1970, focus was on strengthening the humanities; and in 1971 and 1972, emphasis was placed on improving the quality of instruction in the life sciences.

Visiting scholars were brought to the campus and funds were provided for National Teaching Fellows. The persons were employed in the science department (2), the social science department (3), and the humanities (7). The fellows brought a diversification of experimental backgrounds to the campus, and therefore added a strengthening element to the total program of the College. The Consortium relationship also helped the College to secure teaching materials with special relevance for Black Americans.

The Four Institutions Consortium (Art History) was aimed at assisting participating institutions in the development and improvement of courses in ceramics, photography, and multi-media A-V. Barber-Scotia received various pieces of photographic and art equipment. Approximately 150 students were served yearly in the art program. Major emphasis was placed on developing a course curriculun for multi-media in Art History instruction, and upgrading the quality of instruction in the humanities with special emphasis on the teaching of Art History. Barber-Scotia College received immeasurable benefit from this Consortium in that equipment received is still being used in the photography classes and the Art laboratory.

The College Placement Service Consortium for Black Colleges involved 62 colleges and enabled Barber-Scotia College to establish and maintain an efficient Career Counseling and Placement Center. The College was able to begin a concerted effort to provide Placement service to Seniors and graduates. To date, more than 50 per centum of the recent graduates are employed in non-traditional positions, in business and industry or government agencies. Barber-Scotia College participated in this program until 1976. Many improvements were made in the Placement area including the establishment of a Career Library and the beginning of a Career Conference, both of which are now integral parts of the program offerings of the College.

The Cooperative Curriculum Development Program was a cooperative venture between Barber-Scotia College and Johnson C. Smith University. As a result of this program, the two institutions were able to pool resources and plan for the provision of a more comprehensive package of service to students on both campuses.

The New Doorways to Higher Education Program began in 1972 and provided funds for structuring the five professional centers in the academic area. During the first year, the program centered around the development of a Freshman Studies component tailored to meet more of the needs of students from culturally disadvantaged backgrounds. A pre-school center was established as a part of the Center for Educational Development. This center was equipped as a learning laboratory for children and served approximately 60 children each year. The center focused on the open education design. During the second and third years of funding, improvements were made in each of the professional centers, and staff persons hired in critical areas. A major in Business Administration was added in the Center for Economic Development. Equipment was purchased for use in the department, and a part-time secretary was hired. The Center for Humanities restructured its curricular offerings to provide enrichment in music, art, and literary experience. In the Center for Natural Science and Allied Health Professions, funds were used to acquire scientific equipment, establish a mathematics laboratory, and to provide field experiences for staff and students. In the Center for Political and Social Development, the procedure for student field experience was developed, equipment was purchased, and an additional faculty person was employed in Sociology (at the doctoral level).

The Supportive Services Program in 1973-74 provided funds for improving the admissions and recruitment function, student services, and the development of a program in Computer Science and Technology. The recruiting and admission functions were consolidated, and the funds were provided for staff development.

In the Computer Science component, an effort was made to secure education-based packages from Educational Computing Service. A study was done to determine the feasibility of using computer equipment in the registration of students.

The Cooperative Education Program, started in the 1973-74 school year, provided an opportunity for students to engage in off-campus work experiences for credit. Unfortunately, the program was started at a time when the economic conditions prevented many employers from being receptive to Cooperative Education. However, the institution was able to set guidelines and make numerous contacts with business and industry persons. Students have been placed at IBM, Burroughs Corporation, a local bank, WSOC-TV, and a community organization in Concord. Students have been placed also during the summer months with Consolidated Neighborhood Services, of St. Louis, and Girl Scouts of America. Students who participated in the Co-op Program demonstrated greater commitment to studies upon returning, and received more opportunities for gainful employment upon graduation.

Current Title III Involvement

Barber-Scotia College presently participates in 12 Title III programs. Programs under Administrative Improvement include a component that focuses on Plant Management, Word Processing, Alumni Affairs, Recruitment, Trustee Relations, Institutional Research, and Long Range Planning. Each of these programs has made a variety of contributions toward improving the overall administration of the College. As a Faculty Development component, Barber-Scotia College coordinates and participates in the Consortium on Research Training which serves 13 other developing institutions. Various research projects have been conducted and have become a part of the journals published by the Consortium. Other programs presently funded include the following:

(1) Administrative Improvement--for improving the administration of Informational Services, Alumni Affairs, Recruitment, Plant Management, and Trustee Relations. As a result of this program, the College has been able to employ personnel in each of the functional areas above, purchase equipment for the production of campus literature, and provide additional funds for recruitment of students and professional development of Staff and Trustees.

(2) Cooperative Physics--a joint effort between 40 developing institutions aimed at providing an opportunity for more students at participating institutions to receive training in Physics. Howard University serves as the assisting institution for this Consortium coordinated by Elizabeth City State University. As a result of this program, the College has had three students to successfully complete the summer program at Howard. Scotia is now in the process of preparing an Instructional Manual for the Physics 141 course.

(3) Cultural Enrichment--a program aimed at bringing together various artists and the campus for the enrichment of the College family and the community at large. The effort has been highly successful in that we have been able to provide enrichment in the arts, humanities, education, and politics.

(4) Entry Level (Thirteen College Curriculum Programs)--for entering students. The Freshman curriculum has been restructured to meet the unique needs of new students. While Barber-Scotia is only in its third year of funding with Thirteen College Curriculum Program, the institution has already seen improvements in the performance of Freshmen and hopes to experience marked improvement in student retention and increased GPA's over the next 3 years.

(5) Health Services--the purpose of this Consortium is to improve health services at member institutions. In order to achieve this goal, the Consortium assists with faculty salaries, equipment, and supplies and provides an opportunity for members to exchange ideas, and share expertise in the area of Health Services.

(6) Institutional Research--presently in its third year of funding, this program has made giant strides towards helping the institution to develop a sound base of statistical information. The Institutional Research office has become

the central source for disseminating institutional statistics, and provides periodic updates on the Fact Book that was first compiled by the office in 1974.

(7) International Curriculum--in its second year of funding, the activities in this program have increased the College family's level of awareness of other cultures. Workshops with international students have been held, resource persons from West Africa have visited the campus, a specialist on the American Indian Culture has participated, and an International Club has been organized for students. The members of the International committee are presently engaged in developing teaching modules to be used in classroom instruction.

(8) Learning Resources/Media--this program is presently in its first year of funding. By the end of the current year, media equipment on the campus is to be centralized, and media workshops will have involved faculty, staff, and students across the campus.

(9) Long Range Planning--participation in this program has afforded the College an opportunity to systematically review its mission and goals. Machinery is being developed to assist each division in designing its 5-year plan. A great deal of the information required for following the Long Range Planning model has been supplied by institutional research.

(10) Test-Taking and Learning Skills--The goal of this dual component program is to prepare junior and senior students to perform more successfully on standardized tests in the short run, and to introduce new teaching methods to faculty persons who teach disadvantaged students. As more students are exposed to teaching techniques that help them to sharpen their analytical, investigative skills, scores on standardized tests are expected to improve on a gradual basis. Students have demonstrated a need for the service provided by Test-Taking, and participation in this program is the College's attempt to meet that need.

(11) TACTICS (Technical Assistance Consortium to Improve College Services)--the college has also been a participant in the TACTICS components since 1971. The institution has also received substantial benefits from participation in the TACTICS component over the years. Personnel, across the campus, have taken advantage of the workshops, conferences, printed materials, and consultant services provided by the Consortium.

(12) Student Services Institute--this Institute, which is coordinated by the United Board for College Development, has provided invaluable assistance in the administration of student services. Each year, staff persons are invited to participate in conference and workshop activities, and consultant services are made available in areas of critical need.

The overall impact of Title III on academic programs at Barber-Scotia College has been tremendous. The faculty, employed in critical areas such as reading and the counseling service for students, have proven to be great assets to the College as it attempts to meet the individual needs of students and prepares them to meet the challenges of living in today's society. Title III funds have also helped the institution to become more competitive in its salaries. This salary improvement has been accompanied by the ability to hire more qualified faculty persons. The assisting agency relationships provided by Title III have been invaluable assets to the implementation of programs. The access to resource materials, resource persons, conference opportunities, and in-depth training sessions provided by the agencies, has helped to assure success in making each program an integral part of the total program of the College.

It should be clear to all, of the purpose which draws this sudden and timed attention to a report which is nearly a year old, and which was addressed during public hearings conducted by the House of Representatives.

The assistance which Title III has provided Black institutions is significant. However, it remains clear that because these institutions serve the low income and disadvantaged student their need for financial assistance under Title III will continue and should be increased.

Prepared Statement of Dr. Shirley Napier

KNOXVILLE COLLEGE
KNOXVILLE, TENNESSEE 37921
615/546-0751

OFFICE OF THE PRESIDENT

November 20, 1979

The Senate Judiciary Subcommittee
on Limitations of Contracted and
Delegated Authority
Senator Thad Cochran of Mississippi
328 Russell Senate Office Building
Washington, DC 20510

ATTENTION: Ms. Jackie Knox

Dear Senator Cochran:

This report serves as testimony to the accomplishments of Title III funding and contributions of assisting agencies in helping Knoxville College reach its goals in 1978-1979. I am requesting that this testimony become a part of the records.

The report shows that Title III funding afforded opportunities for the College to accelerate its emphasis on certain areas included in overall college development and in areas of OE priority with the help of assisting agencies. The University of Tennessee, as assisting agency, provided a number of requisite services related to the designated areas of funding. Other assisting agencies also provided beneficial consultant services, workshops and conferences at no cost to the College.

Newspaper accounts which highlighted Title III activities on the Knoxville College campus were inaccurate and failed to present a true picture of such activities. Further, the brevity of this report fails to do justice to the real impact of Title III funding for campus development and strengthening.

Sincerely,

Shirley Napier

(Dr.) Shirley Napier
SDIP Coordinator

SN/ef

Enclosure

Testimony To
Accomplishments of Title III Funding and Contributions of the Assisting Agency in Helping Knoxville College Reach Its Goals in 1978-1979

By Shirley Napier, Ed.D.
SDIP Coordinator
Knoxville College
Knoxville, Tennessee

November 19, 1979

Testimony To Accomplishments of Title III Funding
And Contributions Of The Assisting Agency In
Helping Knoxville College Reach Its Goals in 1978-1979

I. Introduction

This testimony, authorized on November 19, 1979, by Dr. Rutherford H. Adkins, president of Knoxville College and submitted by Shirley Rita Napier, SDIP Coordinator, was assigned for two purposes: (1) to recount the accomplishments of Title III funding and (2) to review the contributions of assisting agencies in helping Knoxville College reach its goals in 1978-1979. Within this context the report proposes to present evidence of progress toward institutional goals and the role of assisting agencies in perpetuating this progress.

The report is divided into 3 parts which address 1) institutional goals to which Title III contributed, 2) the roles of assisting agencies in goal accomplishment and 3) overall accompplishments of the Title III program.

Information presented in this testimony comes from the Title III proposal, (original and amended application) internal evaluation reports, the External Evaluation Report, reports of the President to the Board of Trustees, letters and other documents to and from assisting agencies, and the Institutional Self-Study.

II. Institutional Goals To Which Title III Contributed

Title III funding in 1978-1979 afforded opportunities for Knoxville College to accelerate its emphasis on certain areas included in overall college development. Broadly, the areas of College development are spelled out in 5 major institutional goals which set the tone for college advancement over the next 5 years. Two of the goals are defined as process goals, i.e., internal campus goals. Three are outcome goals or substantive goals the College is seeking to achieve. The institutional goals are:

Outcome goals

1. To produce liberally educated graduates who are prepared for advanced studies and expanding employment opportunities.
2. To increase enrollment of students of diverse interests, talents, and backgrounds and help them develop positive attitudes toward self-directed, life-long learning.
3. To enhance personal development of students by providing experiences planned to enable them to make discriminating moral judgments, identify personal goals and means of achieving them and discover a greater sense of self-worth and self-confidence.

Process Goals

1. To improve the system of participatory governance which involves students, faculty, administrators, and Board members in decision-making and in improvement of the neighborhood in which the College is located.
2. To meet demanding standards of accountability in effectiveness and efficiency in the operation of all College programs.

The institution's major goals addressed Office of Education (OE) priorities to the extent that the College was awarded funding for the programs identified in the chart below. Illustrated also are OE priorities, award levels and non-federal outlays.

OE Priority	Program Funded	Award Level	Non-Federal Outlay
Curriculum Development and Faculty Development	1. Basic Studies	$110,000	$ 1,000
	2. Interdisciplinary Careers: Social Science	75,000	6,334
	3. Improving Business and Economics	35,000	5,667
	4. Instructional Support	25,000	
Student Services	5. Strengthening Student Activities and Comprehensive Counseling	69,000	9,833
Administrative Improvement and Fiscal Management	6. Admissions & Recruitment Enhancement	90,000	6,089
	7. Administrative and Physical Plant Planning and Management	80,000	3,750
	8. Title III Coordination	30,000	

III. Assisting Agencies

The University of Tennessee was written into the 1978-1979 Title III proposal as assisting agency for Knoxville College at a cost of $6,000. The cost of services was to be prorated among the various programs funded. Specifics concerning the contractual agreement, as they related to the funded programs, are excerpted below as taken from a letter requesting services of the university.

> In fulfillment of the agreement to have the University of Tennessee, Knoxville (UTK) serve as an "Assisting Institution" in Title III, Basic Institutional Development Programs with Knoxville College, Knoxville College requests the following specific services at the agreed upon cost of $4,000. In the area of Administrative Improvement, Knoxville College requests -
>
> 1. Specific recommendations on priorities for changes in physical facilities that are in accord with regulations governing Section 504 of the Rehabilitation Act of 1973.
>
> 2. Assistance in developing for physical plant management a) a preventive maintenance system, b) an inventory system and c) improvements in the work order system.
>
> In Student Services assistance is required in -
>
> 1. Developing a records processing system for Admissions & Financial Aid offices.
>
> 2. Assessing the admissions counseling function.
>
> 3. Assessing foreign student credentials.
>
> 4. Recommending social science organizations for students on campus.
>
> 5. Designing a model system for student conduct.
>
> In Curriculum Development, Knoxville College would like an explanation of the University's Basic Studies Program.
>
> In the area of faculty development, alternatives for improved faculty evaluations are requested.

The university offered services in each of the requested areas, and Knoxville College was notified that UTK would "compensate individuals (where appropriate) through the university. Therefore, the college should transmit payment for such services directly to the University." Out of this arrangement, the College benefitted most from consultative services.

Other assisting agencies provided different types of services for the College through workshops, conferences and campus visitation. Institutional and programmatic needs determined the types of strengthening activities the College participated in. The listing below identifies those activities.

Workshops and Conferences Attended

Orientation & Procedures Workshop
Oct. 23-25, 1978
Capahosic, Virginia

ISE-MIS
Feb. 2-9, 1979
Washington, DC

Interdisciplinary Program Review
Alabama A & M University
Oct. 19-20, 1978
Huntsville, Alabama

American College Personnel
  Association Convention
Mar. 25-29, 1979
Los Angeles, California

The Management Information System/
  Institutional Research (MIS/IR)
  Summer Institute
July 15-20, 1979
New Orleans, Louisiana

Federal Technical Assistance Workshop
July 16-18, 1979
Topeka, Kansas

Annual Admissions Institute
April 30-May 4, 1979
Capahosic, Virginia

TACTICS and Phelps Stokes
Conference on Accountability
  and Evaluation
April 16-19, 1979
Jackson, Tennessee

ISE-Southern Regional Cluster Workshop
Oct. 2-4, 1978
Charlotte, NC

Management Development Program
Lane College
April 17-19, 1979
Jackson, Tennessee

TACTICS End of Year Conference
May 30 - June 1, 1979
Atlanta, Georgia

MOTON Federal & Foundation Relations Program
October 1978
New Orleans, Louisiana

In addition to workshops and conferences, several assisting agencies conducted campus visitations upon request at no cost to the College. There were three such visits. One was an Admissions Program Review by the Moton Consortium on Admissions and Financial Aid (MCAFA). The visit was followed up with technical assistance to the Financial Aid Office by an MCAFA consultant. The Title III Coordinator requested and was provided an orientation to management by the Phelps Stokes Management Development Program.

IV. Overall Accomplishment Toward Institutional Goals

Title III funds have provided support for institutional strengthening such that certain types of activities have become ongoing college operations. These include:

1. Utilization of a time sharing interactive mini-computer purchased with non-governmental funds. Offices participating in the transactional information system and considered "on-line" are offices of the Registrar, Admissions, Alumni Affairs, Financial Aid, and Dean of Students. Funds, to purchase time on the interactive mini-computer, were provided by Title III.
2. Implementation of an interdisciplinary honors program with a strong career orientation.
3. Improved operation of the Business Office and Fiscal Management.

Corrective actions have been taken to insure accountability and credibility where fiscal matters are concerned. The new computer system is being implemented to handle accounts receivable accounting and standard accounts receivable collection procedures. Adequate cash flow, to handle routine financial operations, has been realized through successful negotiation of an $800,000 line of credit with local banks. Adoption and implementation of a Five-Year Financial Plan promises to continue to improve the College's financial posture.

4. Strengthened participative decision-making in the planning process.

Some Title III funds were again used to support individuals in advanced degree programs.

In summary, Title III funding afforded Knoxville College an opportunity to strengthen itself "across the board" through eight programs. The programs funded were integral to the institution's outcome and process goals and fitted neatly into priorities identified by the Office of Education. Work performed by assisting agencies was complementary to the work of the institution and to the work of individual programs. A variety of beneficial services were provided by assisting agencies. Those provided by the University of Tennessee cost the College. Other agencies bore many of the costs of their services. Title III funds have provided support for institutional strengthening that has resulted in certain types of activities becoming ongoing college operations. Further, some educational programs have been piloted and are now under full implementation; others have been strengthened and still others are undergoing "growing pains."

Prepared Statment of Dr. F. George Shipman

Livingstone College
Salisbury, North Carolina 28144

OFFICE OF PRESIDENT

November 20, 1979

Honorable Thad Cochran, Of Mississippi
Attention of: Ms. Jackie Knox
328 Russell Senate Office Building
Washington, DC 20510

Dear Mr. Cochran:

I am attaching to this letter testimony for the Senate Committee on Limitations of Contracted and Delegated Authority. This testimony is in support of the Title III Program, and I am requesting that it be entered into the record of your committee.

Thank you.

Very truly yours,

F. George Shipman

F. George Shipman
President

FGS/pas

TESTIMONY
FOR
SENATE JUDICIARY SUB-COMMITTEE
ON LIMITATIONS OF CONTRACTED AND DELEGATED AUTHORITY

SUBJECT: The Impact of the Title III Program (Strengthening Developing Institutions) on Livingstone College

SUBMITTED BY: Dr. F. George Shipman
President
Livingstone College
Salisbury, North Carolina

The Title III Program has had a tremendous impact on the growth and development of Livingstone College over the past decade. With assistance from this program, we have kept our programs relative to the trends in higher education and, therefore, provided a variety of opportunities for student development. Livingstone College has made every attempt in the past, and will continue in the future, to use the funds from this program wisely and effectively. We are committed to providing a quality education for our students, because we believe that they are indeed an important resource in our society and that they deserve the opportunity to develop their potential and to become productive and useful citizens in the American Society.

We believe that support from the Title III program must be continued because it gives the small college serving low income and minority students a resource from which to draw support for needed programs and activities. This support is needed because, like many other small colleges, our endowment income is not substantial enough to support the variety of new programs that we have been able to initiate and implement with assistance from Title III. Additionally, we have not been able to secure the foundation and corporation support necessary to initiate and sustain all of the programs needed.

The Title III Program has been, at Livingstone and continues to be, one of the most important funding sources for us. Because the program is so broad in scope, we have been able to maximize the use of these funds so that every dollar spent benefits the institution immeasurably. The impact at Livingstone has been in four basic, but important, areas: Curriculum Development, Faculty Development; Student Services, and Administrative Improvement. The program objectives in these areas have been realized through effective and efficient use of the cooperative arrangement structure provided by Title III. The bilateral arrangements with assisting agencies and institutions have been highly productive for us as an institution in that they have allowed us to take advantage of the unlimited expertise of agencies and institutions and utilize their ideas and suggestions to improve programs and operations on our campus. The consortium arrangements have, likewise, been very valuable to us. As a result of these arrangements we have gained unlimited assistance in developing our academic and administrative services in the areas of Student Services, Academic Administration and Planning, Library Administration, Health Services, Federal Relations, Research Training and the Humanities. The National Teaching Fellow and Professor Emeritus grants have been used extensively to upgrade course offerings, initiate new majors and areas of concentration and replace faculty members away on study leave.

The Title III Program has helped us to improve our curriculum and provide additional opportunities for students to prepare for emerging careers. The Business Department on our campus is one excellent example of how Title III funds have been used to upgrade faculty, and purchase equipment, materials and supplies needed to add majors in Business administration, accounting, and management. Other areas of curriculum improvement include the Music Department, where we have utilized National Teaching Fellows to strengthen course offerings and we are presently initiating a program in Music Therapy with seed money from Title III.

In the area of Freshman Studies, the College has designed a new and innovative program to meet the needs of low income and minority students, many of whom come to us with deficiencies in the Basic Skills area. Title III funds have helped us to employ persons qualified to address the needs of our students and prepare them for success in their career pursuits.

In the area of Physics, we have upgraded curriculum offerings, purchased some equipment and supplies, and we are currently beginning implementation of the Dual Degree in Engineering program with Georgia Technical Institute that will prepare our students to take advantage of additional career opportunities.

Our International Curriculum Development Program has helped us to raise the campus and community awareness of international affairs and develop a greater appreciation for the values of persons from other cultures.

The Title III contribution to the continuous development of our faculty has been invaluable. It has helped us to support a number of study leaves and employ persons with needed degrees in crucial areas. Further evidence of the impact of Faculty Development activities is the fact that between 1965 and 1978 the percentage of Ph. D's increased from 22% to 33%. This is a very important statistic to a small college such as ours because, maintaining a highly credentialed faculty is not only one of the requirements of our accrediting agency, but having this ability, also allows us to keep our programs current. The Faculty Development Program has also afforded us the opportunity to provide development activities for faculty in the way of attendance at professional meetings and conferences. This opportunity has kept our faculty abreast to changes and developments in their fields and is continually reflected in planning for course content and extra curricular offerings.

The Student Services area has benefitted from the Living-Learning Centers Program which focuses on bringing the concept of learning into residence halls. The Cultural Enrichment Program brings scholars, lecturers and performing artists to the campus and exposes our students to a variety of nationally known persons. The Counseling and Testing Program, which is a service very essential to the total development of our students, has been greatly improved with assistance from Title III.

The overall administration of the College has improved by the implementation of programs in Institutional Research, Long Range Planning, Recruitment and Admissions, Business and Fiscal Management, and Financial Aid Management.

Livingstone College has indeed benefitted from its participation in the Title III Program. With the financial crises in education becoming more acute, and as the rate of inflation rises; we believe that Livingstone and many other colleges of similar purpose will need continued support if we are to maintain quality programs and continue providing educational opportunities for low income and minority students.

We appreciate this opportunity to have input into the hearing of your committee and encourage your favorable consideration of the needs of Livingstone College, and similiar institutions, in your deliberations and recommendations for the reauthorization of the Higher Education Act and the Title III Program We, therefore, request that this testimony be submitted for the record of your committee.

Thank you.

F. George Shipman
Dr. F. George Shipman
President
LIVINGSTONE COLLEGE

INSTITUTIONAL PROFILE

Livingstone College
Salisbury, North Carolina 28144

Livingstone College, founded in 1879, is a private four year liberal arts college located in Salisbury, North Carolina, a city with a population of approximately 26,000. The College is accredited by the North Carolina State Department of Public Instruction, the Southern Association of Schools and Colleges and the Council on Social Work Education. While the College is operated under the auspices of the African Methodist Episcopal Zion Church, it is, however, non-sectarian in its practices and is open without regard to ethnic, cultural, or religious differences to all persons with potential to profit from its program and who are committed to growth and development in a supportive environment. Livingstone seeks to help students develop a keen sense of personal and social responsibility by providing a unified program of general and specialized education; and emphasizing the development of high intellectual, cultural and moral standards.

The present campus is comprised of 22 buildings spread over 272 acres of land. The enrollment for 1979-80 is 938 with more than 50% of the students coming from North Carolina.

Philosophy and Historical Role

Livingstone College seeks to provide the opportunity for students to develop broad perspectives, with a critical and constructive approach to life and acquire sustaining values by which they may live and participate effectively in an ever changing society.

The College, by virtue of its origin, has traditionally served a predominantly Black student population. Over the years the percentage of low income students served has always been significant. Livingstone has, therefore, sought to tailor its programs to meet unique needs of disadvantaged students and equip them with the skills necessary to participate in the mainstream of the American Society. The graduates of Livingstone have consequently gone on to become leaders in education, government, business and other professions such as law and medicine. Throughout its existence, Livingstone has made an effort to provide various types of service to the community-at-large. Campus facilities are often used by community persons and most programs sponsored by the College are open for community participation.

Prepared Statement of McKinley Newton

PHILANDER SMITH COLLEGE
LITTLE ROCK, ARKANSAS

GRANT S. SHOCKLEY, President

Office of the Vice President
for Federal Affairs

November 21, 1979

The Honorable Senator Thad Cochran
328 Russell Senate Office Building
Washington, D. C. 20510

RE: Limitations of Contracts and
Delegated Authority

Dear Senator Cochran:

I am submitting this testimony to reflect the impact of Federal Support under Title III, Higher Education Act, 1965, Strengthening Developing Institutions Programs (P.L. 89-329) as amended has made at Philander Smith College in helping it to accomplish its mission. And, the contributions the various Title III assisting agencies have made at the college in providing the needed technical assistance and leadership in helping the college to accomplish its Title III goals because of the complex problems we face as a developing institution.

The college was established for freedmen west of the Mississippi River in 1877. Philander Smith College, born in a tradition of Christian faith, hope, and charity derived its sustenance from deeds through which these ideas were effected. The central mission of the college was to meet the educational needs of young black whose inadequate early education, poverty, place of residence, race and culture, all rendered them ineligible to the more advantaged American.

The college will continue to maintain a program and an academic community which fosters love of learning, spirit of independent inquiry, a free exchange of ideas, a broad and active Christian life, and a concern for the world in which we live. In addition, the college will seek to help each student to develop his potentiality, as well as to help him/her make a good living and encourage others in their pursuit of life, liberty and happiness.

Philander Smith College had a unique mission from the outset, in 1877, as a new educational venture of joint action by methodists, both black and white, in providing many opportunities and experiences for disadvantaged students that could not be duplicated elsewhere. The college has vigorously sought to fulfill her mission in the face of tremendous social and financial adversities. The large number of highly skilled, professionally trained persons who graduated from Philander Smith College represent living testimonial of our successful pursuit of this commitment. In spite of our accomplishments, we are aware of the social influences that alter the educational needs of our clientele. We are continuously striving to improve the quality of existing programs as well as responding to the new and ever changing demands in many contemporary fields. Therefore, the survival of quality education at Philander Smith College almost mandates future financial assistance be available from federal, state and private sources coupled with the technical assistance from the various Title III assisting agencies in order that the college may fulfill her role as a viable institution of intellectual leadership in this period of intense transition.

Therefore, we are soliciting your support in helping us to secure continued funding of this law, plus the endorsement of the law for institutions to use an array of assisting agencies to help the college move into the mainstream of higher education.

The Title III program has made a great impact on the health of Philander Smith College. At the beginning of the funding period, the college was in grave danger in the implementation of some of its programs. However, since our involvement in the Title III program and the involvement of the various assisting agencies, considerable strides have been made toward a sound operation and we have gained a new sense of purpose and self direction as well as made a viable contribution to higher education and this nation. As a result of Title III, we have been able to accomplish the following:

- Implement a remedial Freshmen Studies Program that provided training in the basic skills (reading, writing, and mathematics) that served about 200 students each academic year as well as to enhance our counseling and advising facilities. The assisting agency was Institute for Services to Education (ISE).

- Implement a development program which assisted the college in implementing its two million dollars capital fund improvement. The assisting agency was the Cooperative College Development Program (CCDP).

- Implement an Audio-Tutorial Media Center. The assisting universities were the State University of New York and Baldwin-Wallace College.

- Involve our personnel in the TACTICS Programs.

- Implement a Test Taking and Learning Skills Program for about 300 students. Assisting agencies were College Placement Services and RCA.

- Implement a Strategy for Institutional Advancement and Institutional Research and Planning. The assisting agency was the Phelps-Stokes Fund.

- Design and implement a college Career Education and Placement Center which serves the college community. The assisting agency was College Placement Services.

- Implement an International Curriculum Program. The assisting agency was the Phelps-Stokes Fund.

- Keep our enrollment at about even during the period of transition with the Admissions/Recruitment Program. The assisting agency and institution were Moton Consortium on Admissions and Financial Aid and Baldwin-Wallace College.

- Strengthen our faculty by providing an opportunity for four of our current faculty to receive terminal degrees; two to take a leave of absence for the last two years seeking terminal degrees; eight to receive masters; more than one-half of the faculty and administrators to engage yearly in summer graduate study, attend institutes and workshops, plus on-campus seminars. The assisting universities were Baldwin-Wallace College and the State University of New York et al.

- Establish a Title III Coordinator's Office for a more effective operation of the Title III program. The assisting agency was Moton Federal Relations Program.

As Philander Smith College looks ahead to 1980, it is important for her to build upon her present strengths with increased focus on new policies, programs, services, and commitments designed to strengthen the capacity of the institution thus enabling a more favorable milieu for the faculty and students. This is deemed necessary if her clientele are to live more effectively in this competitive, complex and changing world.

In order to both, (a) enhance its service function and (b) move forward toward new and vital approaches to education in 1980, Philander Smith College will work vigorously to accomplish its objectives through the following programs with the assistance of the various assisting agencies for the calendar year of 1979-80. They are:

1. Freshmen Studies Program - Assisting agency - ISE
2. Strengthening of Admissions/Recruitment and Retention Program - Assisting agency - Moton Consortium on Admissions and Financial Aid
3. Strengthening of the Business Office and Fiscal Operation - Assisting Agency - James Madigan and Company
4. Strengthening of the Faculty, Administrators and Staff Personnel - The University of Evansville et al.
5. Student Job Referral, Placement and Follow-up - Assisting agency - College Placement Services, Inc.
6. Administrative/Management, Institutional Advancement and Research - Assisting agencies - Phelps-Stokes Fund and Barbara Holmes Associates
7. Educational Media Services/(Audio-Tutorial Laboratory) - Assisting agencies - Two local Radio Stations

8. Strengthening of the Financial Aid Program - Assisting agency - Moton Consortium on Admissions and Financial Aid

9. Title III Coordinator - Planning, Management and Evaluation - Assisting agency - Moton Federal Relations component of TACTICS

   - Other indirect services will be delivered by all the components of TACTICS to our academic community.

As a result of Title III, the college was able to accomplish the following:

- Raise $750,000 for an addition of a new Science Building.
- Secure a $240,000 grant from NSF to strengthen the science offering at the college.
- To spend $573,000 for the renovation of various buildings on the campus.
- To secure a CETA grant of $46,000 this past year and summer that involved thrity of our students in the Cooperative Education Program.
- Securing a current (STIP) grant from the state for the training of 20 students from the low income area.
- Conducting an annual UNCF state wide campaign that produced an average of $45,000 for current operation this past year.
- Securing and spending $100,000 last year for the beautification of the campus.
- Building a new Maintenance Building.
- Implementing the renovation of the Music Building.
- Having at least 75% of the faculty and staff to contribute 1% of their salaries to the annual UNCF Campaign.
- Strengthening the image of the college among its publics.
- To operate in the black for the past four years.
- Strengthening the plans and programs for reducing attrition at the college. This is being done by expanding and better advising of students plus stronger orientation program and admissions. Also, a more effective freshmen studies program and tutorial services for all students in need of it is now being implemented.

We are requesting that a copy of our testimony be submitted for the record to the Senate Judiciary Sub-Committee on Limitations of Contracted and Delegated authority.

And, just as a reminder, 85% of the students at Philander Smith College are from families in rural Arkansas with income less than $6,000.

We are grateful for any consideration given us in this endeavor.

Sincerely yours,

McKinley Newton

McKinley Newton
(501) 375-9845 Ext. 75

Crawford J. Mims

Crawford J. Mims
Acting President Pro Tem

MKN:cw

Prepared Statement of George B. Thomas

OFFICE OF THE PRESIDENT

November 21, 1979

The Honorable Thad Cochran
Senator of Mississippi
ATTENTION: Ms. Jackie Knox
328 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Cochran:

Pursuant to testimony on Title III, I am herewith submitting for the record the "Impact of Title III at Voorhees College."

I trust that this statement of testimony is in order.

With warm and sincere regards, I am

Sincerely yours,

George B. Thomas
President

GBT:RLS/ihj

Enclosure

Denmark, South Carolina 29042 (803) 793-3351

IMPACT OF TITLE III AT VOORHEES COLLEGE

Title III support has had a significant impact upon the viability and serviceability of Voorhees College. All programs, operations and activities have been enhanced and strengthened. Management has been improved; the management process includes the direction and decision-making activities performed by the administration, academic and support supervisors. A planning process is being incorporated into all academic and support functions and operations. The planning process involves identifying the most relevant and desirable goals, developing feasible program plans, and assuring maximum achievement of the established goals with the most cost-effective use of the college's resources. An evaluation process is being developed that will allow for the continual monitoring and assessing toward goal achievement.

Since the 1977-78 academic year, the college has implemented several Advanced Institutional Development Program (AIDP) activities. This program has had the net effect of engendering greater organizational interdependence while simultaneously re-inforcing the identity of each major or minor unit of the college. The decision-making process has been facilitated; policy development has been enhanced; and there is better day-to-day management and accountability throughout the college with a resultant increase in productivity of all college personnel.

Since the implementation of AIDP at Voorhees College, a greater percentage of time and effort is devoted toward improving the planning and management strategies of the institution. An effective evaluation system is also being developed, so as to enable us to know where we are and where we are going in order to make the institution stable and progressive.

Institutional Research and Management Information Systems are working together for the first time at Voorhees to provide information necessary for adequate decision-making. The MIS component has provided for the entire institution to have input into systems designs so as to allow the institution to obtain the type of information that will be required for carrying out various functions and services in an orderly, timely, and easily accessible manner.

Competency-Based Instruction and the Learning Resources Laboratory (LRL) are working closely together. This will create faculty, academic, and student programs that will complement each other and promote cohesiveness in the total academic area. LRL has been very instrumental in assisting the type of students common place at institutions such as Voorhees with an open-door admittance policy. This particular component of our Title III Project has assisted us to develop a very formal and organized method of determining the academic needs of our students.

Student Personnel Services (SPS) which encompasses career counseling and placement, academic and personal counseling, student life, etc. has improved greatly in the quality of programs established for our students as a result of AIDP. Career Planning and Placement has made tremendous progress in increasing the number of services available for our students. Generally throughout SPS, greater emphasis is being placed on reaching more students and serving them on a continuous basis. Counseling aids and materials have increased in quantity and are continuously updated.

Title III has encouraged us to develop and strengthen fiscal management. We are currently in the process of developing a very sophisticated operation that will provide the college with the type of financial reports and procedures that will facilitate the total development of the college.

AIDP has profoundly strengthened the viability and serviceability of Voorhees College. It has enhanced or improved the services available to our students. Also it has allowed for self-improvement of faculty and staff, by providing opportunities for attendance at and participation in appropriate training workshops and informative conferences. More than anything, however, AIDP has necessitated the formulation of short and long term plans, the development and the work toward accomplishment of goals and objectives that are a direct outgrowth of the mission of the college.

GBT:RLS/ihj
11/21/79

Prepared Statement of Dr. Donald M. Stewart

SPELMAN COLLEGE
Office of the President
ATLANTA, GEORGIA 30314

November 21, 1979

Senator Thad Cochran, of Mississippi
Attention of: Ms. Jackie Knox
328 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Cochran:

Enclosed please find a copy of the testimony submitted to the Senate Sub-Committee on Limitations of Contracted and Delegated Authority by Dr. Donald M. Stewart regarding the accomplishments made as a result of Title III funding at Spelman College. It is hoped that this and other testimony and efforts will result in increased and continued Title III funding.

Sincerely,

Renee F. Williams

Renee F. Williams
Executive Assistant to the President

Enclosure

350 SPELMAN LANE, SOUTHWEST

TO:

Senate Judiciary Sub-Committee
on Limitations of Contracted
and Delegated Authority

FROM:

Dr. Donald M. Stewart, President
Spelman College
Atlanta, Georgia

****

TITLE III FUNDING

AT

SPELMAN COLLEGE

November 20, 1979

Dr. Donald M. Stewart
Spelman College

INTRODUCTION

It is requested that this testimony be submitted for the record. Furthermore, it is hoped that this testimony will reflect the accomplishments of Title III funding at Spelman College, as well as reflect the contributions of its assisting agency on helping Spelman College reach its Title III goals.

TITLE III FUNDING ACCOMPLISHMENTS

As an outstanding historically Black College for women, Spelman College strives for academic excellence in liberal education. This relatively small private College attempts to provide an academic climate which is conducive to the full development of students intellectual and leadership potential. Spelman College expects that the student, the community, and the society at large will benefit from liberal education at Spelman College. Spelman has been and will continue to be one of the major sources of trained Black women in the country.

Without a doubt, Spelman College has benefited from Title III funds. Title III funds have enabled Spelman to continue to strive towards its goals. With Title III funds, Spelman College has shown remarkable growth and improvement through the strengthening of its faculty, curriculum and administrative and student services.

Spelman College has been awarded three Title III (AIDP, SDIP) grants. One of those grants, awarded in 1974, expired December, 1978. (The remaining two expire 1980 and 1981, respectively.) As a result of AIDP/SDIP funds, Spelman has made and continues to make great strides toward growth and improvement. Because we can do so from an overall perspective, the major accomplishments made during the first grant period will be focused on here.

TITLE III FUNDING ACCOMPLISHMENTS

In March, 1979, a three-member team for the Education Improvement Program of the Southern Association of Colleges and Schools completed an external evaluation of the AID Program at Spelman. That evaluation noted several major accomplishments of the Title III AID Program at Spelman College.

A. Natural Sciences

The Natural Sciences Division is a strong and growing Division which needed and received assistance in several areas. AIDP funds enabled the Natural Sciences Division over the grant period (1976-1978) to:

1. Increase the number of faculty members.
2. Increase student enrollment from 176 to 315 (112% increase in science majors).
3. Develop new courses (e.g. Biostatistics Concentration, Environment Science, etc.).
4. Expand the Chemistry Department. In the early years of the Division, one basic Chemistry course existed.
5. Develop a Biochemistry lab and one-year Biochemistry course.
6. Develop and refine a Summer program for selected entering freshmen. The program enrolls 45 new students for an eight-week period. As a result of the program, more students make honors in their freshmen year, the attrition rate decreased, etc.

B. Planning, Management and Evaluation

The development of a Planning, Management and Evaluation System under the AID Program is a major accomplishment at Spelman. The System has resulted in decisions being made on an informed basis. This improvement is particularly apparent in the budgeting process with informed budget decisions now being made with imput from all segments of the faculty leadership and appropriate staff.

The assisting agency for the development of the PME System, Arthur D. Little, Inc., played a major role in its development. Under the guidance of the assisting agency, a survey of data sources was carried out; an analysis was made of information needs and sources; and a time table was prepared. Currently, Arthur D. Little, Inc. is assisting and guiding Spelman and other Atlanta University Schools in the design and implementation of a Management Information System. Without ADL's very able assistance, the goals of this very complex task might not be reached.

C. Admissions Office

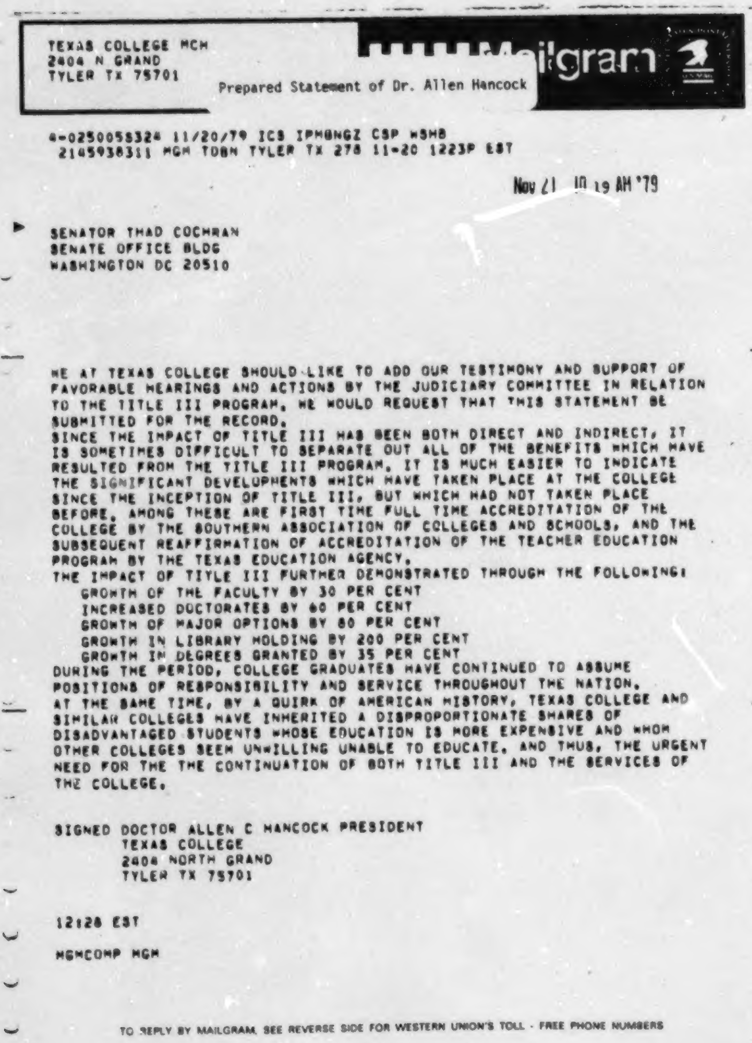
Funds targeted into the Admissions Office have enabled the Admissions Office to grow, improve and operate more efficiently. During the grant period from 1974-1978, the admittance process has been expedited and improved; on-site visits, mailings, and correspondence has been increased and better targeted; some pre-admission problems have been solved and counseling contacts have been increased. Additionally, student acceptance of the core/liberal arts structure has been built; and alumnae, professors, and other College staff have been involved with the admissions program.

D. New Divisions

During the grant period, four new divisions came into existence. The new divisions, now all operating well are Fine Arts, Social Science, Humanities and Education. Interdisciplinary courses have also been added to the curricula, such as a values course in humanities, an urban environmental studies program, a pre-program, and an introductory course in fine arts. In short, the number of interdisciplinary courses and majors will continue to grow, now that a base for their development has been laid and some precedents exist as models.

CONCLUSION

Only a few of the accomplishments made at Spelman College with Title III funding have been noted here. In sum, Title III has been a savior. Although the inevitable short comings resulting from the implementation of large government supported programs have occured at Spelman as well as other institutions, Spelman has benefited tremendously. Certain growth and progress made at Spelman would not have occured without Title III funding. The Title III program was an overdue initiative by the Federal government and it remains a program to be continued as part of the government's effort to offer equal opportunity to all post secondary institutions.



Prepared Statement of Dr. Allen Hancock

TEXAS COLLEGE MCH
2404 N GRAND
TYLER TX 75701

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SENATOR THAD COCHRAN
SENATE OFFICE BLDG
WASHINGTON DC 20510

WE AT TEXAS COLLEGE SHOULD LIKE TO ADD OUR TESTIMONY AND SUPPORT OF FAVORABLE HEARINGS AND ACTIONS BY THE JUDICIARY COMMITTEE IN RELATION TO THE TITLE III PROGRAM, WE WOULD REQUEST THAT THIS STATEMENT BE SUBMITTED FOR THE RECORD.

SINCE THE IMPACT OF TITLE III HAS BEEN BOTH DIRECT AND INDIRECT, IT IS SOMETIMES DIFFICULT TO SEPARATE OUT ALL OF THE BENEFITS WHICH HAVE RESULTED FROM THE TITLE III PROGRAM, IT IS MUCH EASIER TO INDICATE THE SIGNIFICANT DEVELOPMENTS WHICH HAVE TAKEN PLACE AT THE COLLEGE SINCE THE INCEPTION OF TITLE III, BUT WHICH HAD NOT TAKEN PLACE BEFORE, AMONG THESE ARE FIRST TIME FULL TIME ACCREDITATION OF THE COLLEGE BY THE SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS, AND THE SUBSEQUENT REAFFIRMATION OF ACCREDITATION OF THE TEACHER EDUCATION PROGRAM BY THE TEXAS EDUCATION AGENCY,

THE IMPACT OF TITLE III FURTHER DEMONSTRATED THROUGH THE FOLLOWING:

GROWTH OF THE FACULTY BY 30 PER CENT
INCREASED DOCTORATES BY 60 PER CENT
GROWTH OF MAJOR OPTIONS BY 80 PER CENT
GROWTH IN LIBRARY HOLDING BY 200 PER CENT
GROWTH IN DEGREES GRANTED BY 35 PER CENT

DURING THE PERIOD, COLLEGE GRADUATES HAVE CONTINUED TO ASSUME POSITIONS OF RESPONSIBILITY AND SERVICE THROUGHOUT THE NATION.

AT THE SAME TIME, BY A QUIRK OF AMERICAN HISTORY, TEXAS COLLEGE AND SIMILAR COLLEGES HAVE INHERITED A DISPROPORTIONATE SHARES OF DISADVANTAGED STUDENTS WHOSE EDUCATION IS MORE EXPENSIVE AND WHOM OTHER COLLEGES SEEM UNWILLING UNABLE TO EDUCATE, AND THUS, THE URGENT NEED FOR THE THE CONTINUATION OF BOTH TITLE III AND THE SERVICES OF THE COLLEGE.

SIGNED DOCTOR ALLEN C HANCOCK PRESIDENT
TEXAS COLLEGE
2404 NORTH GRAND
TYLER TX 75701

12:28 EST

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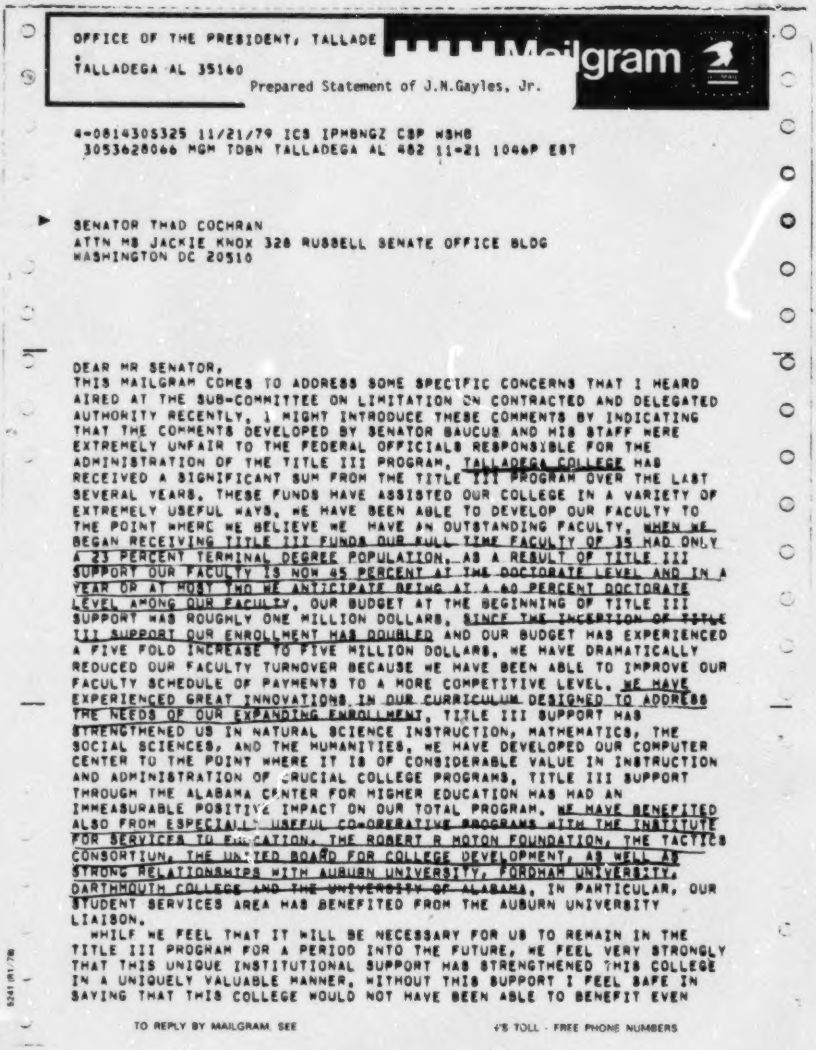
TO REPLY BY MAILGRAM, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS



OFFICE OF THE PRESIDENT, TALLADE
TALLADEGA AL 35160

Prepared Statement of J.N.Gayles, Jr.

4-0814305325 11/21/79 ICS IPMBNGZ CSP WSHB
3053628066 MGM TDBN TALLADEGA AL 402 11-21 1046P EST

SENATOR THAD COCHRAN
ATTN MS JACKIE KNOX 328 RUSSELL SENATE OFFICE BLDG
WASHINGTON DC 20510

DEAR MR SENATOR,
THIS MAILGRAM COMES TO ADDRESS SOME SPECIFIC CONCERNS THAT I HEARD AIRED AT THE SUB-COMMITTEE ON LIMITATION ON CONTRACTED AND DELEGATED AUTHORITY RECENTLY, I MIGHT INTRODUCE THESE COMMENTS BY INDICATING THAT THE COMMENTS DEVELOPED BY SENATOR BAUCUS AND HIS STAFF WERE EXTREMELY UNFAIR TO THE FEDERAL OFFICIALS RESPONSIBLE FOR THE ADMINISTRATION OF THE TITLE III PROGRAM, TALLADEGA COLLEGE HAS RECEIVED A SIGNIFICANT SUM FROM THE TITLE III PROGRAM OVER THE LAST SEVERAL YEARS. THESE FUNDS HAVE ASSISTED OUR COLLEGE IN A VARIETY OF EXTREMELY USEFUL WAYS, WE HAVE BEEN ABLE TO DEVELOP OUR FACULTY TO THE POINT WHERE WE BELIEVE WE HAVE AN OUTSTANDING FACULTY, WHEN WE BEGAN RECEIVING TITLE III FUNDS OUR FULL TIME FACULTY OF 35 HAD ONLY A 23 PERCENT TERMINAL DEGREE POPULATION, AS A RESULT OF TITLE III SUPPORT OUR FACULTY IS NOW 45 PERCENT AT THE DOCTORATE LEVEL AND IN A YEAR OR AT MOST TWO WE ANTICIPATE BEING AT A 60 PERCENT DOCTORATE LEVEL AMONG OUR FACULTY, OUR BUDGET AT THE BEGINNING OF TITLE III SUPPORT WAS ROUGHLY ONE MILLION DOLLARS, SINCE THE INCEPTION OF TITLE III SUPPORT OUR ENROLLMENT HAS DOUBLED AND OUR BUDGET HAS EXPERIENCED A FIVE FOLD INCREASE TO FIVE MILLION DOLLARS, WE HAVE DRAMATICALLY REDUCED OUR FACULTY TURNOVER BECAUSE WE HAVE BEEN ABLE TO IMPROVE OUR FACULTY SCHEDULE OF PAYMENTS TO A MORE COMPETITIVE LEVEL, WE HAVE EXPERIENCED GREAT INNOVATIONS IN OUR CURRICULUM DESIGNED TO ADDRESS THE NEEDS OF OUR EXPANDING ENROLLMENT, TITLE III SUPPORT HAS STRENGTHENED US IN NATURAL SCIENCE INSTRUCTION, MATHEMATICS, THE SOCIAL SCIENCES, AND THE HUMANITIES, WE HAVE DEVELOPED OUR COMPUTER CENTER TO THE POINT WHERE IT IS OF CONSIDERABLE VALUE IN INSTRUCTION AND ADMINISTRATION OF CRUCIAL COLLEGE PROGRAMS, TITLE III SUPPORT THROUGH THE ALABAMA CENTER FOR HIGHER EDUCATION HAS HAD AN IMMEASURABLE POSITIVE IMPACT ON OUR TOTAL PROGRAM, WE HAVE BENEFITED ALSO FROM ESPECIALLY USEFUL CO-OPERATIVE PROGRAMS WITH THE INSTITUTE FOR SERVICES TO EDUCATION, THE ROBERT R MOTON FOUNDATION, THE TACTICS CONSORTIUN, THE UNITED BOARD FOR COLLEGE DEVELOPMENT, AS WELL AS STRONG RELATIONSHIPS WITH AUBURN UNIVERSITY, FORDHAM UNIVERSITY, DARTHMOUTH COLLEGE AND THE UNIVERSITY OF ALABAMA, IN PARTICULAR, OUR STUDENT SERVICES AREA HAS BENEFITED FROM THE AUBURN UNIVERSITY LIAISON.

WHILF WE FEEL THAT IT WILL BE NECESSARY FOR US TO REMAIN IN THE TITLE III PROGRAM FOR A PERIOD INTO THE FUTURE, WE FEEL VERY STRONGLY THAT THIS UNIQUE INSTITUTIONAL SUPPORT HAS STRENGTHENED THIS COLLEGE IN A UNIQUELY VALUABLE MANNER, WITHOUT THIS SUPPORT I FEEL SAFE IN SAYING THAT THIS COLLEGE WOULD NOT HAVE BEEN ABLE TO BENEFIT EVEN

TO REPLY BY MAILGRAM, SEE ... 'S TOLL - FREE PHONE NUMBERS

323

PAGE 2

Mailgram

HALF THE ALABAMA RESIDENTS AND NATIONAL STUDENTS WHO WE PROCESS ANNUALLY. I CERTAINLY LOOK FORWARD TO THE OPPORTUNITY TO DISCUSS THIS CRUCIAL MATTER WITH YOU IN PERSON IN THE VERY NEAR FUTURE.

SINCERELY
JOSEPH N GAYLES JR, PRESIDENT TALLADEGA COLLEGE, TALLADEGA ALABAMA

22:47 EST

MGMCOMP MGM

57 148 471

TO REPLY BY MAILGRAM, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

DECEMBER 5, 1979

MEMORANDUM

TO: FRANK SILBEY
FROM: ARTHUR BRISKMAN
RE: TITLE III TESTIMONY

Attached is a statement from Dr. Joseph N. Gayles, Jr., President of Talladega College, concerning your Subcommittee's hearing on Title III problems. I was advised that the record would remain open for this statement to be submitted. Dr. Gayles' statement has the endorsement of the following educators:

Dr. Levi Watkins, President
Alabama State University
Montgomery, Alabama

Dr. Jessie Lewis, President
Lawson State Community College
Birmingham, Alabama

Dr. Richard Morrison, President
Alabama A & M University
Normal, Alabama

Thank you for your cooperation in this matter.

ABB/lga
Enclosure

Statement of Dr. Joseph N. Gayles, President, Talladega College, Talladega, Alabama, before the United States Senate Subcommittee on Limitations of Contracted and Delegated Authority.

This statement addresses some specific concerns that I recently heard aired at the Subcommittee on Limitations of Contracted and Delegated Authority. I might introduce these comments by indicating that the comments developed by Senator Baucus and his staff were extremely unfair to the federal officials responsible for the administration of the Title III program. Talladega College has received a significant sum from the Title III program over the last several years. These funds have assisted our college in a variety of extremely useful ways. We have been able to develop our faculty to the point where we believe we have an outstanding faculty. When we began receiving Title III funds our full time faculty of 35 had only a 23 percent terminal degree population. As a result of Title III support, our faculty is now 45 percent at the doctorate level and in a year, or at most, two, we anticipate being at a 60 percent doctorate level among our faculty. Our budget at the beginning of Title III support was roughly one million dollars. Since the inception of Title III support our enrollment has doubled and our budget has experienced a five-fold increase to five million dollars. We have dramatically reduced our faculty turnover because we have been able to improve our faculty schedule of payments to a more competitive level. We have experienced great innovations in our curriculum designed to address the needs of our expanding enrollment. Title III support has strengthened us in natural science instruction, mathematics, the social sciences, and the humanities. We have developed our computer center to the point where it is of considerable value in instruction and the administration of crucial college programs. Title III support through the Alabama Center for Higher Education has had an immeasurable positive impact on our total program. We have benefited also from especially useful cooperative programs with the Institute for Services to Education, the Robert R. Moton Foundation, the Tactics Consortium, and the United Board for College Development, as well as strong relationships with Auburn University, Fordham University, Dartmouth College and the University of Alabama. In particular, our student services area has benefited from our liaison with Auburn University.

While we feel that it will be necessary for us to remain in the Title III program for a period into the future, we feel very strongly that this unique institutional support has strengthened this college in a uniquely valuable manner. Without this support I feel safe in saying that this college would not have been able to benefit even half the Alabama residents and national students we process annually. I certainly look forward to the opportunity to discuss this crucial matter with you in person in the very near future.

Prepared Statement of Norman C. Francis

TESTIMONY
TO THE
SUBCOMMITTEE ON LIMITATIONS OF CONTRACTED AND DELEGATED AUTHORITY
OF THE
SENATE JUDICIARY COMMITTEE
BY
NORMAN C. FRANCIS
PRESIDENT, XAVIER UNIVERSITY OF LOUISIANA
NOVEMBER 21, 1979

The Honorable Thad Cochran, Chairman, and members of the Committee, I wish to present the following testimony for your Committee's consideration in regards to the review and evaluation of the contributions of the Title III of The Higher Education Act of 1965, in keeping with the intent of the Legislation. As a Developing Institution, Xavier University has been strengthened.

Xavier University was awarded and Advanced Institutional Development Program (AIDP) Grant in 1974 and continued through December 1978. Subsequent to that grant, Xavier has successfully competed for additional awards under Title III. These grants have made substantial and continuing impacts on the institution in a wide variety of ways. One of the activities that was required of all grantees was called Planning Management and Evaluation. The major thrust of this activity was to upgrade the overall management capability of each of the funded institutions. A great deal of latitude was given each of the institutions to devise the strategies for including their own management style. Activities at Xavier University included conferences, seminars, workshops, and counseling. The overall management design of the institution as it evolves through the time of the grant are very close to the management systems recommended by the National Association of College and University Business Offices and the Society for College and University Planning.

There are many tangible results from the effort to upgrade the management capability of an institution. The usual evidences of such an effort are manuals, procedures, improved decision making time frames, as well as achievement of objectives that are physical and easily documented. There are more subtle outcomes that should be considered. The institution is more easily able to consider both the resources necessary to execute programs as well as the potential results of such programs. The institution now considers both factors when making decisions.

Another major impact of the program has been to generate substantial body of support from faculty members toward periodic program evaluation, by collecting data which indicate achievement levels of institutional objectives. Faculty members have been able to design educational strategies to accomplish objectives and continuously monitor and modify their approach when necessary.

The overall planning and evaluation activities initially sponsored by the AIDP grant has spread throughout the institution and it can be safely said that almost all activities that occur at the institution are inevitable part of the Planning Management Evaluation system of that institution and not as an ad hoc growth of day to day activities.

For the first time in the institutions history, all the plans are submitted with the budget for the 1980-81 academic year and the budgets are derived from the objectives of the plans. This integration of the planning and budgeting cycle is considered to be of the greatest achievement of the AIDP funding at Xavier University.

The second most important contribution to Xavier University from AIDP has been the opportunity to develop appropriate computer support for our management and academic programs. We have been able to provide a college information system which enables our decision makers to have timely management information on almost every area of the institution. AIDP support has enabled us to have fiscal reports generated in a timely fashion that enables us to make appropriate monitoring decision regarding our resources. One important result of this has been the fact that we have been able to have a balanced budget for each of the years that we have received AIDP support.

In addition we have been able to develop computer assistance instruction in a variety of academic areas and are constantly improving our capability in this area.

The largest activity supported with AIDP has been a program entitled Freshman Programs the main thrust of the effort was to coordinate developmental programs in Reading, Speech, English, and Mathematics. As a part of the program we have also provided interdisciplinary honors courses for our freshmen. This program has undergone substantial evaluation by a variety of external agencies and individuals. The critical impact of the program has been that the developmental students have become competitive at the college level. This is documented by the fact that the rate of retention for students who need remedial work has been close to the retention rate for those not needing remediation. Support for this program has enabled us to decrease the human cost that our students historically have carried because of inadequate preparation.

AIDP support has also enabled us to generate substantial increase in the number of opportunities available to our students. With this type of support we have been able to generate an exciting program in early Childhood Education which has become a permanent part of our education curriculum. We have also been able to develop the first program in Therapeutic Arts especially designed for people working with handicapped children in the State of Louisiana. We have integrated a large number of quantitative training opportunities into our Social Science curriculum. We have been able to monitor a steady increase in the percentage of students using the library on a regular basis over the life of the grant. The development of our Learning Resource Center plays a significant role in this increase. AIDP has enabled our Counseling Center to become the hub of our student personnel activities on campus. Students rate the Counseling Center among the top four areas on campus in their ability to deliver a meaningful service to students. It is important to keep in mind that our Counseling Center was struggling for survival and not well thought of during at the start of the AIDP grant.

One of the major strategies used in accomplishing the achievement mentioned above as well as a large number of others have been the effective utilization of outside resources to assist our institution. AIDP has provided assistance enabling our staff to pursue new skills procedures and ideas in a wide variety of ways. A majority of this assistance has been provided by our assisting agency, (also a requirement of the grant), and has provided us with a continuing reservoir of ready available assistance by providing substantial amounts of time both as seminar leaders, workshop leader, and more importantly as coach. The assisting agency has enabled us to rapidly integrate our improved management structures into our normal management procedures. Without this kind of thoughtful, sensitive application of theortical management concepts to the sometimes confusing and tumultuous world of higher education, the achievement of the program activities would not have been possible.

Mr. Chairman, and members of the Committee, I respectfully urge you to recommend the continuation of this program. The need for the kind of assistance it has giving remains as critical today as when the legislation was enacted. Tighten guidelines, if necessary, but please don't throw out "the baby with the wash."

The foregoing testimony is submitted for the record.

Prepared Statment of L. H. Foster

Tuskegee Institute
FOUNDED BY BOOKER T. WASHINGTON, 1881
OFFICE OF THE PRESIDENT
TUSKEGEE INSTITUTE
ALABAMA
36088

8 - 9

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November 21, 1979

The Honorable Thad Cochran
322 Russell Senate Office Building
Washington, DC 20510

Attention: Ms. Jackie Knox

Dear Senator Cochran:

Tuskegee Institute is pleased to send the attached statement outlining some of the advances in our work which have been made possible under Title III funding. We request that this statement be made a part of the record.

Kind regards.

Sincerely yours,

L. H. Foster
President

LHF:p

A. P. TORRENCE, PROVOST AND
EXECUTIVE VICE PRESIDENT

L. H. FOSTER
PRESIDENT

L. A. WILLIAMS, VICE PRESIDENT
FOR BUSINESS AFFAIRS

SOME ACCOMPLISHMENTS OF TITLE III FUNDING AT TUSKEGEE INSTITUTE

This testimony to the Senate Judiciary Sub-Committee on Limitations of Contracted and Delegated Authority relates to activities at Tuskegee Institute funded by Title III of the Higher Education Act of 1965, as amended. We request that this be made a part of the record.

Components of the Title III program operating at Tuskegee Institute are Planning, Management and Evaluation; Allied Health; Comprehensive Counseling Center; Business Department and Training of Development Personnel. The strengthening of these activities through Title III funds has been substantial; moreover, it has impacted favorably on the total campus program and served as leverage in securing other financial support.

A. Planning, Management and Evaluation - With Title III support, Tuskegee Institute has developed and implemented a very effective operational procedure for program planning interphased with budgeting. This procedure, which involves every academic and nonacademic unit on campus, has enabled Tuskegee to relate more effectively its financial needs by departments to the limited overall resources of the institution. It has provided greater appreciation of financial limitations of the institution by faculty and staff and pointed out more clearly departmental needs to the administration. Most importantly, the PME component has resulted in the serious evaluation of goals and procedures by academic and nonacademic units. It has required an increased creative, innovative and productive approach to the work in all areas, bringing about qualitative as well as more economical improvements in many cases. The strength of the effort is greatly enhanced through the use of an analytical studies group composed of representatives of the administration, faculty, student body and general staff.

This group helps to design, implement, review and evaluate the total planning process at Tuskegee. It, in effect, extends the arm of the PME office.

B. Allied Health - Title III funding has permitted Tuskegee to explore, design, develop and implement a program in Allied Health to help meet the desperate need for minority professionals in this area and to provide extension services to the Black Belt counties of Alabama where, for the most part, Allied Health professionals are not available. Under-representation of minorities in Allied Health results from the fact that only three black colleges offer Allied Health programs.

A comprehensive Role and Scope study by the Academy for Educational Development recommended in 1972 that Tuskegee Institute establish a program in Allied Health. This was followed with a detailed feasibility study by "outside" experts in the field who confirmed the recommendation of the Academy and pointed out the dire need for more black professionals in the field. The Division of Allied Health at Tuskegee Institute now consists of degree-granting programs in physical therapy, occupational therapy, medical technology, and radiologic technology.

C. Comprehensive Counseling - The Comprehensive Counseling Center was organized into its present structure in July, 1975 with the help of Title III funds. These funds made it possible to expand the Counseling Center's staff from two counselors (who were responsible for personal counseling, international student advising, and testing) to six counselors with the additional services of mental health counseling, academic counseling, and veterans affairs. In the academic counseling services, students have been assisted in understanding academic regulations, exploring ways to improve achievement (e.g., study skills development, tutoring), and facilitating adjustment. The attrition rate at the end of the first semester over a three-year period has been 10.47% in January 1977; 6.4% in January 1978; and 4.04% in January 1979. These statistics represent only those students referred to the CCC tutorial program.

D. Business Department - Title III funding enabled Tuskegee Institute to strengthen considerably its offerings in business, the largest department at the Institute in terms of enrollment. At its summer 1979 meeting, the Tuskegee Institute Board of Trustees approved the elevation of the department to the status of a school.

With the support of Title III funding, the faculty in the Business Department has been strengthened and increased; faculty members have been able to attend relevant professional development meetings; the curricula have been reviewed and modified through restructuring to include interdisciplinary involvement of students enrolled in disciplines outside of business; a multi-media learning resource laboratory has been established with computer terminals, electric calculators, study carrels, filmstrips and the like.

E. Training of Development Personnel - Tuskegee Institute is approaching its 100th anniversary of educational services. In connection with its Centennial celebration and preparation for a second century of service, a major fund-raising effort is being planned. Title III funding of this component of our program has been used primarily for training of fund-raising personnel concentrated in the Office of Development but extending to other appropriate persons on campus, developing organizational structures and approaches, promotional literature, and the like.

Title III funds at Tuskegee Institute have been well managed and effectively utilized to move our program forward in keeping with the mission of the institution. Tuskegee felt needs are too great to permit the careless, sporatic and misdirected use of funds. The few outside consultants used at Tuskegee Institute provided excellent and needed services which can be documented. On occasions, Tuskegee Institute has made use of other Title III related agencies such as the Moton Institute Center for Independent Study where three Tuskegee Institute faculty members had the opportunity to pursue individual professional study on a long-term basis. This was a very useful activity similar to that provided faculty at the Center for the Study of Democratic Institutions and which would not have been otherwise possible for our faculty. This is an activity that should be continued.

Based on our experience at Tuskegee Institute, Title III of the Higher Education Act of 1965 is one of the most effective pieces of legislature ever enacted by the U. S. Congress to move historically neglected institutions of higher education forward. It is clearly in the interest of the National Welfare.

L. H. Foster, President

Prepared Statement of
Hon. William D. Ford and
Hon. John H. Buchanan, Jr.

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
COMMITTEE ON EDUCATION AND LABOR
SUBCOMMITTEE ON POSTSECONDARY EDUCATION
518 HOUSE OFFICE BUILDING ANNEX #1
WASHINGTON, D.C. 20515

November 28, 1979

Senator Max Baucus
Chairman
Senate Subcommittee on
  Limitations of Contracted
  and Delegated Authority
407A Senate Courts Building
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman:

In your opening statement to begin your November 14 hearing on title III of the Higher Education Act, the Strengthening Developing Institutions program, you expressed dismay at the manner in which title III grants are made, the potential for conflicts of interest between applicants, readers and Office of Education personnel, and the failure to grantees to adequately account for their title III funds expenditures. We share your concerns and, like you, want to do everything we can to ensure that the title III program is improved so that it can realize the intent of Congress to assist struggling colleges.

Over the past several weeks, newspaper reports have appeared which purport to reveal for the first time deficiencies in the focus and administration of title III. These news articles, while they have highlighted findings contained in a report published in February by the General Accounting Office, have omitted any discussion of the steps already taken by the House of Representatives in H.R. 5192, Education Amendments of 1980, to address these issues.

In keeping with the careful review and close scrutiny of all programs by the House Subcommittee on Postsecondary Education during the reauthorization hearings, the Subcommittee held three days of hearings on the management of the title III program as well as the findings and recommendations in the GAO report. Witnesses at the hearings included GAO investigators who prepared the report, HEW administrative personnel, analysts from the National Center for Education Statistics, presidents of grantee institutions, and representatives of assisting agencies. Based on information gathered at these hearings, including a number of recommendations made in the GAO report, the Subcommittee redrafted the significantly modified key title III statutory provisions.

The Subcommittee heard testimony regarding the vagueness of the criteria used for determining eligibility for grants under the title III program. Convinced that incorporating a precise definition of a developing institution into H.R. 5192 would help improve administration of the program, the Subcommittee included language in the bill which defines such institutions based upon an institution's low-income student enrollment and average educational expenditures per student. This firm and objective criteria will aid in streamlining the administration of the title III program. The full House of Representatives further tightened the eligibility determination process by adopting floor amendments which defined the term 'educational and general expenditures' and which required the Secretary to submit an annual report to Congress listing all institutions for which the eligibility criteria were waived and the reasons why they were waived.

Management considerations also motivated the Subcommittee to provide a more clearly delineated focus for use of program funds by requiring participating institutions to use title III monies to improve academic quality, institutional management and fiscal stability. H.R. 5192 expressly restricts use of title III funding to those purposes authorized in the bill. To further guide HEW in the selection of applications for funding, the Subcommittee's bill lists a range of program activities such as faculty development, administrative management, and improvement of academic programs to receive priority funding consideration. In direct response to a GAO recommendation, H.R. 5192 mandates that grantee institutions report yearly on their progress toward completing development activities and establish specific priorities to be achieved with title III funding. Of particular importance is a provision in the bill requiring each participating institution to submit a detailed analysis of its fiscal control and accounting procedures. The Subcommittee also made it clear that the Secretary more carefully monitors disbursement of title III funding by program managers.

An entire chapter of the GAO report on title III dealt with program administration. The GAO said that the selection procedures for grant awards were inconsistently applied; that it was questionable if the most deserving institutions were receiving the awards; and that the method for computing the awards had fallen into the hands of the staff of the Office of Education. In response to these criticisms, the application review process was significantly strengthened by amendments adopted during full House consideration of the bill. An amendment clarified the reader selection process and specifically prohibited any conflict of interest between the readers and the applicants. Detailed briefing instructions must now be provided the readers by the program office, including examples of the types of activities which should receive special consideration and factors to be used to determine the amount and duration of the grant. A Committee on Review is established which would recommend to the Secretary adjustment of grant awards if the aggregate amount recommended by the readers exceeded the total amount appropriated for the title III program. Finally, the Secretary is required to publish in the *Federal Register* by June 30 of each year a list of grants awarded and the reader and Committee on Review award recommendations.

Testimony was also presented to the Subcommittee concerning the role and operation of consortia and consultants specializing in providing title III assistance. Because the Subcommittee was persuaded that irregularities and misuse of funds have occurred in conjunction with these arrangements, the requirement that institutions participate in such arrangements was deleted. Institutions which choose to continue to receive such technical assistance must now submit detailed reports on accounting procedures governing this arrangement, according to language in the Committee Report on H.R. 5192.

The Subcommittee heard comments regarding the failure of institutions to progress and graduate from the title III program. Carefully constructed funding categories inserted into H.R. 5192 provide a new structural framework which included incentives to enhance long-range institutional planning and movement through the program. The legislation is designed to restrict the length of participation in the program by creation of three new grant categories. For example, an institution may apply for a competitive, one to three year grant which is renewable. A new four to seven year, nonrenewable grant is established with 25 percent of the program's appropriation reserved for this category. The reserve feature will insure availability of substantially larger grants to encourage multi-year planning which anticipated movement out of the program. Institutions receiving nonrenewable grants are foreclosed from applying for the renewable funding. The distinction in funding levels and duration of awards will provide important incentives for institutions to progress through the program.

A third component in the comprehensive title III funding package, challenge grants, is aimed at stimulating institutions to move away from dependency on federal funding and seek alternative resources. By requiring that federal funds be matched, the challenge grant program is delayed until 1982 to permit dissemination of information and development of solid proposals. The challenge grant initiative will involve an application competitive process with funding priority for institutions in the nonrenewable title III grant category. The challenge grant proposal provides a new mechanism and further incentive to eligible institutions in their quest for self-sufficiency and fiscal stability.

We firmly believe that the changes proposed in H.R. 5192 will improve the title III grant process and allow more time for the Grant and Procurement Management Division of the Office of Education to properly negotiate final title III awards. Several references were made during the floor debate on H.R. 5192 to the issues to be raised in the then anticipated hearing by the Senate Subcommittee on Limitations of Contracted and Delegated Authority and to the news articles which preceded the hearing. In order to make information regarding the recent action taken by the House of Representatives to correct deficiencies in the title III program more available to interested groups, we request that this letter be included as a part of your November 14 hearing record.

With kindest regards,

Sincerely,

William D. Ford
Chairman

John H. Buchanan, Jr.
Ranking Minority Member

Prepared Statement of Donna Gomien

To: The File 9-29-79
From: Donna Gomien
Re: Grant Supplement for Edward Waters College

I received a recommendation for a $144,000 grant supplement from for Edward Waters College on September 29, 1979. The supplement was to fund a subcontract for one year. The grant itself is for 2 years at $840,000.

On examining the materials relating to the supplement, I noticed that no information on it had been included in the Edward Waters College proposal (submitted February 1, 1979). According to the General Provisions (45 CFR 100), a school cannot receive a grant, or in this case a supplement to a grant, for an activity not included in the approved proposal.

I called Dr. Lorenzo Woodward, Title III Coordinator at Edward Waters College, to discuss the supplement problem. I first asked him where the activity was located in the original proposal, as it was possible I had missed it through an oversight. Dr. Woodard responded that the supplement was not a part of the original proposal. He stated that Enterprises for New Directions had submitted the proposal on its own behalf. He explained that he had only recently been told by the college president that he would be responsible for discussing the ENDS activity with OE, and that Edward Waters would be responsible for the activity's coordination.

I told Dr. Woodard that I could not deal with it if it was not in the original proposal. He expressed his concern that $200,000 was a lot of money to lose. I mentioned that the figure was wrong, but did not tell him the recommended amount. He suggested that I handle the supplement as an addendum to the grant proposal. I explained that not only was it hard to deal with an addendum received two days

EWC (3)

before the end of the fiscal year and seven months after the grant application deadline, but that any authorized attendance must go through competition before being recommended for funding.

Dr. Woodward excused himself and requested to call me back in 15 minutes, which he did. He had attempted to reach the college president, who was not available. We discussed the ~~[illegible]~~ situation briefly, and I recommended that if the College were still interested, they could include the ENDS activity in their next grant proposal (1981), but that without any better information ~~[illegible]~~ it was as far as I could go with the proposed supplement.

Dr. Woodward asked to discuss the problem with me on Monday, and I indicated that I would [illegible] available, but that FY 79 ends [illegible] at midnight on Sunday. That [illegible] the case, no OPMD action is [illegible].

[illegible] NEGOTIATION [illegible] GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

1. [illegible] REQUEST NUMBER 451 AH 70194

2. DATE OF REQUEST [illegible]

3. GRANT NO. [illegible]

4. NAME OF RECIPIENT Edward Waters College, Jacksonville, Fl.

5. ENTITY NUMBER 1591146275101

6a. BUDGET PERIOD: BEGIN DATE; END DATE

6b. PERFORMANCE PERIOD: BEGIN DATE; END DATE

6c. PROJECT LENGTH (MONTHS) 24

		DUE DATES	
7. REPORTS			
a. QUARTERLY			▨
b. SEMI-ANNUAL	✓		▨
c. ANNUAL		▨	▨
d. FINAL	✓	▨	▨
E. [illegible] ✓			

8. OE PROJECT OFFICER NAME Paul D. Crandall

9. GRANTEE'S PROJECT DIRECTOR NAME Lorenzo A. Woodward

10. FINANCIAL DATA	FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
	1979	7-003 084	4151	
			10a. TOTAL →	

PART II - BUDGET ANALYSIS Bilateral

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GFMD FOOTNOTE REFERENCE F
1. PERSONNEL	870,806				
2. FRINGE BENEFITS	143,724				
3. TRAVEL	38,836				
4. EQUIPMENT	61,855				
5. SUPPLIES	25,963				
6. CONTRACTUAL	52,850				
7. CONSTRUCTION					
8. OTHER	295,862				
9. INDIRECT CHARGES					
10. TRAINEE COST/STIPEND					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	1,489,896	840,000			

OE FORM 5378, 12/77 REPLACES OE FORM 5378, 2/77, WHICH IS OBSOLETE

GFMD - ORIGINAL

Supplement

FUNDING DOCUMENTATION FOR GRANTS AND ASSISTANCE CONTRACTS

PART I - AWARD DATA

454 AH 90194

TYPE OF REQUEST: ☐ N ☐ C ☒ S ☐ R ☐ M

NAME OF APPLICANT: Edward Waters College (Florida)

GRANT NUMBER (If C, S, R or M)

ENTITY NUMBER (EIN): 1 591144 6251 A1

PROJECT LENGTH: 12

7. REPORTS		DUE DATES	
A. QUARTERLY			
B. SEMI-ANNUAL	✓		▨
C. ANNUAL		▨	▨
D. FINAL	✓	▨	▨

PROGRAM OFFICER: Dr. Ralph Dunham (202) 245-2337

GRANTEE'S PROJECT DIRECTOR: Lorenzo A. Lockwood (904) 353 4575

9. Extension

FISCAL YEAR	CAN	OBJECT CLASS	AMOUNT
79	2003084	41.51	144,000

10. FINANCIAL DATA

[illegible]

10A. TOTAL → 144,000

PART II - BUDGET ANALYSIS

BUDGET OBJECT CLASS CATEGORIES A	AMOUNT REQUESTED B	AMOUNT RECOMMENDED C	PROGRAM FOOTNOTE REFERENCE D	AMOUNT NEGOTIATED E	GPVD FOOTNOTE REFERENCE F
1. PERSONNEL	876,806	56,600			
2. FRINGE BENEFITS	143,724	10,754			
3. TRAVEL	38,836	20,000			
4. EQUIPMENT	61,855	0			
5. SUPPLIES	25,963				
6. CONTRACTUAL	52,850				
7. CONSTRUCTION					
8. OTHER	295,812	56,646			
9. INDIRECT CHARGES					
10. SPONSOR COST SHARING					
11. INSTITUTIONAL ALLOWANCE					
12. TOTAL	1,489,896	$144,000			

EDWARD WATERS COLLEGE

ACTIVITY: Strengthening, Coordination and Evaluation of Title III Programs

TOTAL REQUEST: $144,884 for 1 year

Recommended Funding level: $144,000

Length of Funding: 1 Year

Justification for Funding:

The purpose of this activity is to identify and evaluate exemplary programs funded by Title III at predominantly Black institutions. A handbook will be developed to document innovative programs selected for study. The case studies will be made available to all institutions participating in the Title III program. The handbook will assist all grantees in the processes used to develop, refine, implement, coordinate, monitor, and evaluate Title III activities. It will also assist grantees in the documentation and accountability of Title III funds.

This activity will be coordinated by Edward Waters College with the assistance of Enterprises for New Direction. It addresses the following Title III program priorities:

1. strengthening the academic program for low income and minority students,
2. improving the institution's overall administrative capacity, and
3. improving the management of Federal assistance programs.